To: Nate Teti[ntet@statoil.com]

From: Bylin, Carey

**Sent:** Wed 2/24/2016 2:53:44 PM

Subject: Re: Hi

Sure. I am sitting on the aisle that leads straight into the podium. Want to meet at the back of the room at the end of that aisle?

Carey Bylin

On Feb 24, 2016, at 8:37 AM, Nate Teti < ntet@statoil.com > wrote:

Hi Carey,

Want to meet after Gina?

Nate

Sent from my HTC

---- Reply message -----

From: "Bylin, Carey" < Bylin.Carey@epa.gov>

To: "Nate Teti" < ntet@statoil.com >

Subject: Hi

Date: Tue, Feb 23, 2016 8:01 PM

Hi Nate,

Hope your trip to Norway was good. It turns out that Joe can't make it to CERA Week so I'll be participating instead. I will be there for only part of the day tomorrow but I'm free other than our panel and seeing the Administrator speak. Let me know if you want to try to meet, otherwise I'm free later this week or next

Carey Bylin

On Feb 10, 2016, at 11:44 AM, Nate Teti < ntet@statoil.com > wrote:

I am actually speaking on a panel on methane at CERA Week with Joe Goffman.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Monday, February 08, 2016 8:33 AM

To: Nate Teti Subject: RE: Hi Hi Nate,

Thank you for getting in touch. Yes, it would be great to talk to you about Methane Challenge. How does tomorrow look for you?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Nate Teti [mailto:ntet@statoil.com]
Sent: Thursday, February 04, 2016 4:13 PM
To: Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Hi

Hi Carey,

Hope all is well. I was wondering if you have some time in the near future to discuss EPA's methane challenge. Thanks

Nate

Nate Teti Vice President, Communications DPUSA COM Statoil North America, Inc.

Mobile: Ex. 6 - Personal Privacy
Telephone: +1 713 485 2606

Email: ntet@statoil.com

Visitor address: Building 4, 8th Floor2101 CityWest Boulevard, USA

Incorporation number: 2125856

www.statoil.com

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Thank you

To: Nate Teti[ntet@statoil.com]

From: Bylin, Carey

**Sent:** Wed 2/24/2016 2:01:31 AM

Subject: Re: Hi

Hi Nate,

Hope your trip to Norway was good. It turns out that Joe can't make it to CERA Week so I'll be participating instead. I will be there for only part of the day tomorrow but I'm free other than our panel and seeing the Administrator speak. Let me know if you want to try to meet, otherwise I'm free later this week or next

Carey Bylin

On Feb 10, 2016, at 11:44 AM, Nate Teti < ntet@statoil.com > wrote:

I am actually speaking on a panel on methane at CERA Week with Joe Goffman.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Monday, February 08, 2016 8:33 AM

To: Nate Teti Subject: RE: Hi

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\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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<image001.gif>

From: Nate Teti [mailto:ntet@statoil.com]
Sent: Thursday, February 04, 2016 4:13 PM
To: Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Hi

Hi Carey,

Hope all is well. I was wondering if you have some time in the near future to discuss EPA's methane challenge. Thanks

Nate

Nate Teti

Vice President, Communications DPUSA COM Statoil North America, Inc.

Mobile: Ex. 6 - Personal Privacy
Telephone: +1 713 485 2606
Email: ntet@statoil.com

Visitor address: Building 4, 8th Floor2101 CityWest Boulevard, USA

**To:** Moerlins, Mary[Mary.Moerlins@nwnatural.com]

From: Bylin, Carey

Sent: Wed 2/24/2016 2:01:27 AM
Subject: Re: Joining Methane Challenge

Hi Mary,

Thank you for getting in touch. We are so pleased to hear the you plan to join the Methane Challenge Program.

Yes, signing the Partnership Agreement is the key first step. I'm not sure if the agreement online will work for your purposes, but note we've created a Word version that can accommodate further detail with respect to commitment levels. For example, we've talked to some companies that want to sign up at the corporate level butane source-specific commitments at the LDC level. I'm not sure if that applies to NW Natural but if so just let me know. I'm also happy to set up a call if there are other items you would like to discuss.

We are working to release further details about the launch event, including the date we will need confirmation of charter partners. I will provide that as soon as it's available.

Best,

Carey Bylin

On Feb 18, 2016, at 1:43 PM, Moerlins, Mary < Mary. Moerlins@nwnatural.com > wrote:

Carey,

NW Natural is hoping to join the challenge under the BMP challenge (focused on pipeline blowdowns) as a charter/founding member by the End of next month. Beyond creating out commitment paperwork and working the MOU through our legal team, are there other steps that we're overlooking? We will likely not be able to send a representative for the event, but hope to have all of our materials your way in advance.

Today's webinar answered my one outstanding question around pipeline blowdown (thank you).

Best wishes.

# Mary

# Mary Moerlins

Community Affairs & Environmental Programs Manager

NW Natural

220 NW Second Avenue

Portland, Oregon 97209

**5**03.226.4211 x5771

mary.moerlins@nwnatural.com

To: Lacey, Pam[PLacey@aga.org]

**Cc:** Christine Wyman[cwyman@aga.org]; Pamela Franklin[Franklin.Pamela@epa.gov]

From: Bylin, Carey

**Sent:** Mon 2/22/2016 7:06:44 PM

Subject: RE: some questions about Methane Challenge

Hi Pam,

Okay, perhaps there can be targeted follow up if we are not able to answer your questions today.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Monday, February 22, 2016 2:06 PM
To: Bylin, Carey <Bylin.Carey@epa.gov>
Cc: Christine Wyman <cwyman@aga.org>

Subject: RE: some questions about Methane Challenge

Our communications folks would like to get a feel for the launch event and related EPA communications.

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Bylin, Carey"

Date:02/22/2016 1:51 PM (GMT-05:00)

To: "Lacey, Pam"

Cc: Christine Wyman

Subject: Re: some questions about Methane Challenge

Hi Pam,

I don't think that will be possible. Are there some specific inquiries that you can share with us in advance of the meeting?

Carey Bylin

On Feb 22, 2016, at 1:07 PM, Lacey, Pam < PLacey@aga.org > wrote:

Carey - Who is your PR person for the launch? Anny chance they could participate today? - Pam Sent from my Verizon Wireless 4G LTE smartphone ----- Original message -----From: "Bylin, Carey" Date:02/22/2016 11:40 AM (GMT-05:00) To: Christine Wyman Cc: "Lacey, Pam" Subject: RE: some questions about Methane Challenge Hi Christine, Just confirming that we look forward to seeing you this afternoon. Thanks again for organizing this meeting. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Thursday, February 18, 2016 12:28 PM
To: Bylin, Carey < <a href="mailto:Bylin.Carey@epa.gov">Bylin.Carey@epa.gov</a>
Co: Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a>

**Subject:** RE: some questions about Methane Challenge

This is essentially what we were thinking, too. We will do quick introductions for the people in the room, if you could provide a quick summary/update on Methane Challenge, and then we'll move on to questions.

We have arranged for an operator-assisted conference call that will track participants and manage the question queue.

I've pasted the general agenda that we have shared with our members, including the dial-in number.

# **ERAC Conference Call with EPA re: Methane Challenge**

Dial In: Ex. 6 - Personal Privacy

## **AGENDA:**

- **Antitrust Compliance Reminder** Please review <u>AGA's Antitrust Compliance</u> Guidelines and follow them on the call.
- EPA Update on Methane Challenge
- AGA Member Question/Discussion with EPA

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]
Sent: Thursday, February 18, 2016 11:29 AM
To: Christine Wyman <cwyman@aga.org>

Subject: RE: some questions about Methane Challenge

Okay, great, we are confirmed on this end and will come to your offices shortly before 3p on Monday. We do not plan to review any materials in particular. We anticipated that most people will have participated on the webinar and that this will be an opportunity to discuss the Program and answer any remaining questions. Does that sound right?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

**Sent:** Thursday, February 18, 2016 9:28 AM **To:** Bylin, Carey <a href="mailto:Sylin.Carey@epa.gov">Sylin.Carey@epa.gov</a>

Subject: RE: some questions about Methane Challenge

Also, just to confirm, will you have any visual materials such that we'd need to arrange a webinar?

From: Christine Wyman

Sent: Thursday, February 18, 2016 9:26 AM

To: Lacey, Pam < PLacey@aga.org>; Bylin, Carey < Bylin.Carey@epa.gov>

Subject: RE: some questions about Methane Challenge

Thanks so much. We're looking forward to it.

-Christine

Sent: Thursday, February 18, 2016 9:23 AM  To: Bylin, Carey < <a href="mailto:Bylin.Carey@epa.gov">Bylin.Carey@epa.gov</a> >; Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a> > Subject: RE: some questions about Methane Challenge
That time looks good.
Let's have a live meeting at AGA with a phone link. Thanks! -Pam
Sent from my Verizon Wireless 4G LTE smartphone
Original message
From: "Bylin, Carey"
Date:02/18/2016 9:18 AM (GMT-05:00)
To: Christine Wyman , "Lacey, Pam"
Subject: RE: some questions about Methane Challenge
Hi Christine,
SO sorry for the delay on this. This week has totally gotten away from me. How does 3p on Monday, Feb 22 work for you? Please let me know. To confirm, we can plan to come to AGA's offices and have a live and conference call meeting. Alternatively, if you prefer to come here or conduct entirely by conference call that is also fine with us. Thank you for your patience and for your help in setting this up.
Best,
Carey

From: Lacey, Pam

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 16, 2016 12:02 PM

To: Bylin, Carey < Bylin. Carey@epa.gov >; Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Hi Carey – I just wanted to follow up on the AGA meeting. We're happy to limit this to a call if that provides you more flexibility in finding a time. Given than, we're available anytime on Friday, February 19, anytime except from 1 pm-2pm on February 22 and anytime on February 24. If possible, given than many of our members are in the Midwest and West Coast, late morning/afternoon would be best.

Many thanks for your assistance in scheduling this.
Christine
From: Christine Wyman Sent: Wednesday, February 10, 2016 3:50 PM To: 'Bylin, Carey' < <a href="mailto:Bylin.Carey@epa.gov">Bylin.Carey@epa.gov</a> >; Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a> > Subject: RE: some questions about Methane Challenge
Hi Carey – I've listed AGA's availability to host a meeting on February 19, 22 and 24. Hopefully some of these times also will work with your schedules.
Also, I've reached out to our members to gauge availability for the meetings. I've had a great response for interest, but I believe most members will need to participate by phone. Pam and I are both here in DC and would appreciate meeting in person, but if we need to limit this to a call, that is an option as well.
February 19: available all day
February 22: available from 8 a.m. until 11:30 a.m.; 2 p.m. – 5 p.m.
February 24: available from 8 a.m. until 11:30 a.m.: 2 p.m. – 5 p.m.

Thanks,

Christine

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, February 09, 2016 5:29 PM

**To:** Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>>; Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a>>

**Subject:** RE: some questions about Methane Challenge

Hi Christine,

Okay, thanks for the follow up. It is helpful to know that the preference is to organize the meeting after the 18<sup>th</sup>. The 19<sup>th</sup>, 22<sup>nd</sup>, or 24<sup>th</sup> look good preliminarily. If those generally work on your end I'll check internally and come back to you with some specific time proposals. We are happy to come to AGA's offices for the meeting.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

#### <image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 09, 2016 5:02 PM

**To:** Bylin, Carey < <u>Bylin.Carey@epa.gov</u>>; Lacey, Pam < <u>PLacey@aga.org</u>>

Subject: RE: some questions about Methane Challenge

Carey – Thanks so much. I think that 1 hour should be sufficient.

As to the location, we would like the ability to conference in those members who cannot attend in person. We have that capability at AGA. If you do as well, then we're happy to meet wherever is most convenient for you.

I know that our members are eager to learn more about the program and ask questions, but perhaps it would make sense to schedule the AGA meeting after the February 18 webinar? That way the AGA meeting can focus on questions that our members have that were not addressed through the webinar.

If you have a general sense on what week(s) you're thinking, I can poll our members to get a better sense of who would be able to attend the meeting. Many of our members are not local, so they would need to either be in town or have available travel budgets, etc, in order to make the trip.

-Christine

# **Christine Wyman | Senior Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7120 | F: 202-824-9130 | cwyman@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to nearly 69 million customers throughout the nation.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Tuesday, February 09, 2016 4:40 PM **To:** Christine Wyman < cwyman@aga.org>; Lacey, Pam < PLacey@aga.org> Subject: RE: some questions about Methane Challenge Hi Christine, Okay, great, arranging a dedicated meeting sounds good. I assume then that we should plan to come to AGA? Or would you like to come to EPA? Also, how long do you think we will need? Is an hour sufficient or should we reserve two? This will help me as I look at our availabilities. Regarding reporting, I'd ask that those members talk to me directly. Thank you for your follow up on this.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

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U.S. Mail Address:

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<image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Monday, February 08, 2016 10:56 AM

**To:** Bylin, Carey < Bylin. Carey@epa.gov >; Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Hi Carey – Thanks again for your outreach on the Methane Challenge technical information for distribution. We would like to take you up on your offer for a dedicated discussion with AGA members. Would it be possible for you to provide a few dates/times that would work for you that I can propose to our members? Also, we may be able to gather a critical mass of members that would want to participate in person, and then have a dial-in/webinar link for remote members. Please let me know if you would be open to this and if you think it would be beneficial. I can then coordinate with the members to see who would be available.

Also, I wanted to follow up with you on your response to Pam's second question regarding partial year data. I believe the concern of some of our members is that they will not be able to start collecting data within 6 months of when they sign up due to the lag time necessary to change internal procedures and external contracts to align with information requested in Methane Challenge. This is particularly challenging for those members that are very interested in being a Founding Partner. They are just not sure that they will be able to collect the necessary data metrics within 6 months of sign up. This may be a situation where the company would need to speak to you directly.

Thanks again for your assistance,
Christine
From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]  Sent: Thursday, February 04, 2016 3:44 PM  To: Lacey, Pam < PLacey@aga.org> Cc: Christine Wyman < cwyman@aga.org> Subject: RE: some questions about Methane Challenge
Hi Pam,
Thank you for getting in touch on these points. I've entered answers below in red.
I also wanted to let you know that the Supplemental Technical Information document for Distribution is now on our website. We appreciate your comments and feedback on this and welcome any further questions or discussion. In particular, we are having a webinar in two weeks to discuss the proposal and answer questions, but we are happy to set up a dedicated discussion with AGA members if that would be useful.
Thanks again for your engagement on this, we look forward to continued collaboration.
Best regards,
Carey

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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<image001.gif>

From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, February 03, 2016 5:26 PM
To: Bylin, Carey < Bylin.Carey@epa.gov >
Cc: Christine Wyman < cwyman@aga.org >

Subject: some questions about Methane Challenge

Carey – Based on my call today with AGA members, here is an answer to your question - and some questions to you from us.

1. Yes, the Subpart W definition of Natural Gas Distribution would work for us in Methane Challenge, if as in Subpart W, public utility commission is not initial capped. It would also be helpful to have a short acknowledgment somewhere – perhaps in the FAQ if not in the Technical document – noting that the names of state utility rate regulators vary (some are called public service commissions, or department of public utilities for example). In addition, in some states, utility rates are regulated at the local level. For example, one corporation has several LDCs, and the utility rates of one of their LDCs in Texas are regulated by 93 different cities! [I just learned that this afternoon.] That LDC wants to be sure they don't have to enter into 93 MOUs with EPA. Just explain that all these variously named state and local utility rate regulators are intended to be covered by the phrase public utility commissions. By the way, it turns out the Subpart NN definition of LDC is inconsistent with Subpart W – because it includes the extra word "state" in front of public utility commission. Now that we know about the home rule local rate regulators, that makes a difference, and the NN version would not work for Methane Challenge where it refers to rate recovery for replacing pipe for example. For your convenience, here is the Subpart W definition:

# "§98.230 Definition of the source category.

- (a) This source category consists of the following industry segments: ...
- "(8) **Natural gas distribution.** Natural gas distribution means the distribution pipelines and metering and regulating equipment at metering-regulating stations that are operated by a Local Distribution Company (LDC) within a single state that is regulated as a separate operating company **by a public utility commission** or that is operated as an independent municipally-owned distribution system. This segment also excludes customer meters and regulators, infrastructure, and pipelines (both interstate and intrastate) delivering natural gas directly to major industrial users and farm taps upstream of the local distribution company inlet."

**Response**: we hope the definitions we have included in the Framework and Supplemental Technical Information are inclusive, as that is our intent. If there are situations where a specific company has questions about joining or concerns about their inclusion, please direct them to me for discussion.

2. Concern re: flexibility for data gaps for reporting in 2016 partial year – Our members are concerned that they may have only partial data for the first partial year (2016), because it will take more than 6 months to change internal procedures and external contracts (e.g. IT contracts) to align with the information called for in Methane Challenge. They have heard EPA staff say not to worry, that the agency will be flexible. But before they sign up, they would really like to see that assurance in writing somewhere in the Methane Challenge materials.

**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since <u>collection</u> of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer.

4. Can a company with multiple LDCs average pipe mileage across the corporation? That would be most appreciated.

**Response**: The Framework indicates that partners can select the level at which they join the Program, including individual LDCs or aggregated to the parent or corporate level. The commitment will be related to the operational scope of the entity that joins the partnership, so grouping of LDCs for a single commitment is possible. Framework language is copied below:

Partner Commitment Levels

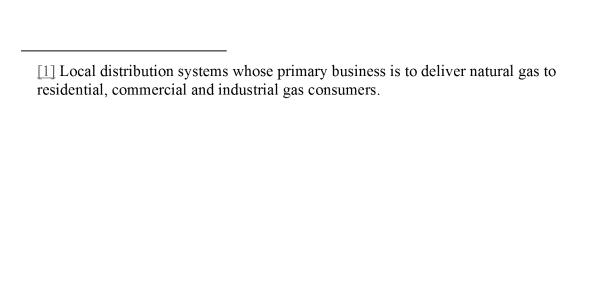
Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels:

## Distribution segment:

• Local distribution company[1] (LDC) within a single state that is regulated as a separate operating company by a public utility commission or that is operated as an

	• Parent company or corporate level (e.g., a single commitment that spans multiple LDCs).
	I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam
	Pamela A. Lacey   Chief Regulatory Counsel
	Office of General Counsel
	American Gas Association
	400 N. Capitol St., NW   Washington, DC   20001
	P: 202-824-7340   M: 202-809-6565   F: 202-824-9190   <u>placey@aga.org</u>
	The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.
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independent municipally-owned distribution system; OR



Lacey, Pam[PLacey@aga.org] To: Cc: Christine Wyman[cwyman@aga.org] From: Bylin, Carey Sent: Mon 2/22/2016 6:51:38 PM Subject: Re: some questions about Methane Challenge Hi Pam, I don't think that will be possible. Are there some specific inquiries that you can share with us in advance of the meeting? Carey Bylin On Feb 22, 2016, at 1:07 PM, Lacey, Pam < PLacey@aga.org > wrote: Carey - Who is your PR person for the launch? Anny chance they could participate today? -Pam Sent from my Verizon Wireless 4G LTE smartphone ----- Original message -----From: "Bylin, Carey" Date:02/22/2016 11:40 AM (GMT-05:00) To: Christine Wyman Cc: "Lacey, Pam" Subject: RE: some questions about Methane Challenge Hi Christine, Just confirming that we look forward to seeing you this afternoon. Thanks again for organizing this meeting.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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Cc: Lacey, Pam < PLacey @aga.org >

Subject: RE: some questions about Methane Challenge

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We have arranged for an operator-assisted conference call that will track participants and manage the question queue.

I've pasted the general agenda that we have shared with our members, including the dial-in number.

# **ERAC Conference Call with EPA re: Methane Challenge**

<del>-</del>
Dial In: Ex. 6 - Personal Privacy
Conference ID: Ex. 6 - Personal Privacy
AGENDA:
• • • • • • • • • • • • • • • • • • •
• □ □ □ □ □ EPA Update on Methane Challenge
• □ □ □ □ □ AGA Member Question/Discussion with EPA
From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]  Sent: Thursday, February 18, 2016 11:29 AM  To: Christine Wyman < cwyman@aga.org >
Subject: RE: some questions about Methane Challenge
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Ms. Carey Bylin
International Programs Leader, Oil and Gas
Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

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Sent: Thursday, February 18, 2016 9:26 AM

To: Lacey, Pam < PLacey@aga.org>; Bylin, Carey < Bylin.Carey@epa.gov>

Subject: RE: some questions about Methane Challenge

Thanks so much. We're looking forward to it.

#### -Christine

From: Lacey, Pam

Sent: Thursday, February 18, 2016 9:23 AM

**To:** Bylin, Carey < <u>Bylin.Carey@epa.gov</u>>; Christine Wyman < <u>cwyman@aga.org</u>>

Subject: RE: some questions about Methane Challenge

That time looks good.

Let's have a live meeting at AGA with a phone link. Thanks! -Pam

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Bylin, Carey"

Date:02/18/2016 9:18 AM (GMT-05:00)

To: Christine Wyman, "Lacey, Pam"

Subject: RE: some questions about Methane Challenge

Hi Christine,

SO sorry for the delay on this. This week has totally gotten away from me. How does 3p on Monday, Feb 22 work for you? Please let me know. To confirm, we can plan to come to AGA's offices and have a live and conference call meeting. Alternatively, if you prefer to come here or conduct entirely by conference call that is also fine with us. Thank you for your patience and for your help in setting this up.

Best, Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address: Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460 <image001.gif> From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 16, 2016 12:02 PM **To:** Bylin, Carey < Bylin. Carey@epa.gov>; Lacey, Pam < PLacey@aga.org>

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Many thanks for your assistance in scheduling this.

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**Christine Wyman | Senior Counsel** 

American Gas Association
400 N. Capitol St., NW   Washington, DC   20001
P: 202-824-7120   F: 202-824-9130   <u>cwyman@aga.org</u>
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Hi Carey – Thanks again for your outreach on the Methane Challenge technical information for distribution. We would like to take you up on your offer for a dedicated discussion with AGA members. Would it be possible for you to provide a few dates/times that would work for you that I can propose to our members? Also, we may be able to gather a critical mass of members that would want to participate in person, and then have a dial-in/webinar link for remote members. Please let me know if you would be open to this and if you think it would be beneficial. I can then coordinate with the members to see who would be available.

Also, I wanted to follow up with you on your response to Pam's second question regarding partial year data. I believe the concern of some of our members is that they will not be able to start collecting data within 6 months of when they sign up due to the lag time necessary

to change internal procedures and external contracts to align with information requested in Methane Challenge. This is particularly challenging for those members that are very interested in being a Founding Partner. They are just not sure that they will be able to collect the necessary data metrics within 6 months of sign up. This may be a situation where the company would need to speak to you directly.

Thanks again for your assistance,

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Sent: Thursday, February 04, 2016 3:44 PM

To: Lacey, Pam < PLacey@aga.org>

Cc: Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>>

Subject: RE: some questions about Methane Challenge

Hi Pam,

Thank you for getting in touch on these points. I've entered answers below in red.

I also wanted to let you know that the Supplemental Technical Information document for Distribution is now on our website. We appreciate your comments and feedback on this and welcome any further questions or discussion. In particular, we are having a webinar in two weeks to discuss the proposal and answer questions, but we are happy to set up a dedicated discussion with AGA members if that would be useful.

Thanks again for your engagement on this, we look forward to continued collaboration.

Best regards, Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address: Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460 <image001.gif>

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Cc: Christine Wyman < cwyman@aga.org >

Subject: some questions about Methane Challenge

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1. Yes, the Subpart W definition of Natural Gas Distribution would work for us in Methane Challenge, if as in Subpart W, public utility commission is not initial capped. It would also be helpful to have a short acknowledgment somewhere – perhaps in the FAQ if not in the Technical document – noting that the names of state utility rate regulators vary (some are called public service commissions, or department of public utilities for example). In addition, in some states, utility rates are regulated at the local level. For example, one corporation has several LDCs, and the utility rates of one of their LDCs in Texas are regulated by 93 different cities! [I just learned that this afternoon.] That LDC wants to be sure they don't have to enter into 93 MOUs with EPA. Just explain that all these variously named state and local utility rate regulators are intended to be covered by the phrase public utility commissions. By the way, it turns out the Subpart NN definition of LDC is inconsistent with Subpart W – because it includes the extra word "state" in front of public utility commission. Now that we know about the home rule local rate regulators, that makes a difference, and the NN version would not work for Methane Challenge where it refers to rate recovery for replacing pipe for example. For your convenience, here is the Subpart W definition:

### "§98.230 Definition of the source category.

- (a) This source category consists of the following industry segments: ...
- "(8) **Natural gas distribution.** Natural gas distribution means the distribution pipelines and metering and regulating equipment at metering-regulating stations that are operated by a Local Distribution Company (LDC) within a single state that is regulated as a separate operating company by a public utility commission or that is operated as an independent municipally-owned distribution system. This segment also excludes customer meters and regulators, infrastructure, and pipelines (both interstate and intrastate) delivering natural gas directly to major industrial users and farm taps upstream of the local distribution company inlet."

**Response**: we hope the definitions we have included in the Framework and Supplemental Technical Information are inclusive, as that is our intent. If there are situations where a specific company has questions about joining or concerns about their inclusion, please direct them to me for discussion.

2. Concern re: flexibility for data gaps for reporting in 2016 partial year – Our members are concerned that they may have only partial data for the first partial year (2016), because it will take more than 6 months to change internal procedures and external

contracts (e.g. IT contracts) to align with the information called for in Methane Challenge. They have heard EPA staff say not to worry, that the agency will be flexible. But before they sign up, they would really like to see that assurance in writing somewhere in the Methane Challenge materials.

**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since <u>collection</u> of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer.

4. Can a company with multiple LDCs average pipe mileage across the corporation? That would be most appreciated.

**Response**: The Framework indicates that partners can select the level at which they join the Program, including individual LDCs or aggregated to the parent or corporate level. The commitment will be related to the operational scope of the entity that joins the partnership, so grouping of LDCs for a single commitment is possible. Framework language is copied below:

Partner Commitment Levels

Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels:

# **Distribution segment:**

- Local distribution company[1] (LDC) within a single state that is regulated as a separate operating company by a public utility commission or that is operated as an independent municipally-owned distribution system; OR
- Parent company or corporate level (e.g., a single commitment that spans multiple LDCs).

I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam

## Pamela A. Lacey | Chief Regulatory Counsel

### Office of General Counsel

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

[1] Local distribution systems residential, commercial and in	whose primary business is to deliver natural gas to idustrial gas consumers.

To: Christine Wyman[cwyman@aga.org]
Cc: Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Mon 2/22/2016 4:40:42 PM

Subject: RE: some questions about Methane Challenge

Hi Christine,

Just confirming that we look forward to seeing you this afternoon. Thanks again for organizing this meeting.

\_\_\_\_\_

Ms. Carey Bylin

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This is essentially what we were thinking, too. We will do quick introductions for the people in the room, if you could provide a quick summary/update on Methane Challenge, and then we'll move on to questions.

We have arranged for an operator-assisted conference call that will track participants and manage the question queue.

I've pasted the general agenda that we have shared with our members, including the dial-in number

## **ERAC Conference Call with EPA re: Methane Challenge**

Dial In: Ex. 6 - Personal Privacy
Conference ID: Ex. 6 - Personal Privacy

### **AGENDA:**

# 

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#### "§98.230 Definition of the source category.

- (a) This source category consists of the following industry segments: ...
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**Response**: we hope the definitions we have included in the Framework and Supplemental Technical Information are inclusive, as that is our intent. If there are situations where a specific company has questions about joining or concerns about their inclusion, please direct them to me for discussion.

2. Concern re: flexibility for data gaps for reporting in 2016 partial year – Our members

are concerned that they may have only partial data for the first partial year (2016), because it will take more than 6 months to change internal procedures and external contracts (e.g. IT contracts) to align with the information called for in Methane Challenge. They have heard EPA staff say not to worry, that the agency will be flexible. But before they sign up, they would really like to see that assurance in writing somewhere in the Methane Challenge materials.

**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since <u>collection</u> of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer.

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Partner Commitment Levels

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I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam
Pamela A. Lacey   Chief Regulatory Counsel
Office of General Counsel
American Gas Association
400 N. Capitol St., NW   Washington, DC   20001
P: 202-824-7340   M: 202-809-6565   F: 202-824-9190   <u>placey@aga.org</u>
The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

[1] Local distribution systems w commercial and industrial gas co	nose primary business is to deliver natural gas to residential, nsumers.

To: Christine Wyman[cwyman@aga.org]

From: Bylin, Carey

**Sent:** Thur 2/18/2016 4:29:07 PM

Subject: RE: some questions about Methane Challenge

Okay, great, we are confirmed on this end and will come to your offices shortly before 3p on Monday. We do not plan to review any materials in particular. We anticipated that most people will have participated on the webinar and that this will be an opportunity to discuss the Program and answer any remaining questions. Does that sound right?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Christine Wyman [mailto:cwyman@aga.org] Sent: Thursday, February 18, 2016 9:28 AM **To:** Bylin, Carey < Bylin. Carey@epa.gov> Subject: RE: some questions about Methane Challenge Also, just to confirm, will you have any visual materials such that we'd need to arrange a webinar? From: Christine Wyman Sent: Thursday, February 18, 2016 9:26 AM To: Lacey, Pam < PLacey@aga.org>; Bylin, Carey < Bylin.Carey@epa.gov> Subject: RE: some questions about Methane Challenge Thanks so much. We're looking forward to it. -Christine From: Lacey, Pam Sent: Thursday, February 18, 2016 9:23 AM To: Bylin, Carey < Bylin, Carey@epa.gov >; Christine Wyman < cwyman@aga.org > Subject: RE: some questions about Methane Challenge That time looks good. Let's have a live meeting at AGA with a phone link. Thanks! -Pam

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

ED\_000761\_0001289

From: "Bylin, Carey" Date:02/18/2016 9:18 AM (GMT-05:00) To: Christine Wyman, "Lacey, Pam" Subject: RE: some questions about Methane Challenge Hi Christine, SO sorry for the delay on this. This week has totally gotten away from me. How does 3p on Monday, Feb 22 work for you? Please let me know. To confirm, we can plan to come to AGA's offices and have a live and conference call meeting. Alternatively, if you prefer to come here or conduct entirely by conference call that is also fine with us. Thank you for your patience and for your help in setting this up. Best, Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669

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From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 16, 2016 12:02 PM

**To:** Bylin, Carey <<u>Bylin.Carey@epa.gov</u>>; Lacey, Pam <<u>PLacey@aga.org</u>>

Subject: RE: some questions about Methane Challenge

Hi Carey – I just wanted to follow up on the AGA meeting. We're happy to limit this to a call if that provides you more flexibility in finding a time. Given than, we're available anytime on Friday, February 19, anytime except from 1 pm-2pm on February 22 and anytime on February 24. If possible, given than many of our members are in the Midwest and West Coast, late morning/afternoon would be best.

Many thanks for your assistance in scheduling this.

Christine

From: Christine Wyman

Sent: Wednesday, February 10, 2016 3:50 PM

To: 'Bylin, Carey' < Bylin. Carey@epa.gov >, Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Hi Carey – I've listed AGA's availability to host a meeting on February 19, 22 and 24. Hopefully some of these times also will work with your schedules.

Also, I've reached out to our members to gauge availability for the meetings. I've had a great response for interest, but I believe most members will need to participate by phone. Pam and I are both here in DC and would appreciate meeting in person, but if we need to limit this to a call, that is an option as well.

February 19: available all day

February 22: available from 8 a.m. until 11:30 a.m.; 2 p.m. – 5 p.m.

February 24: available from 8 a.m. until 11:30 a.m.; 2 p.m. – 5 p.m.

Thanks,

Christine

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, February 09, 2016 5:29 PM

To: Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>>, Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a>>

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your end I'll check internally and come back to you with some specific time proposals. We are happy to come to AGA's offices for the meeting.

\_\_\_\_\_

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Subject: RE: some questions about Methane Challenge

Carey – Thanks so much. I think that 1 hour should be sufficient.

As to the location, we would like the ability to conference in those members who cannot attend in person. We have that capability at AGA. If you do as well, then we're happy to meet

wherever is most convenient for you.

I know that our members are eager to learn more about the program and ask questions, but perhaps it would make sense to schedule the AGA meeting after the February 18 webinar? That way the AGA meeting can focus on questions that our members have that were not addressed

through the webinar.

If you have a general sense on what week(s) you're thinking, I can poll our members to get a better sense of who would be able to attend the meeting. Many of our members are not local, so they would need to either be in town or have available travel budgets, etc, in order to make the

trip.

-Christine

**Christine Wyman | Senior Counsel** 

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7120 | F: 202-824-9130 | cwyman@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to nearly 69 million customers throughout the nation.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, February 09, 2016 4:40 PM

To: Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a> ; Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a> > Subject: RE: some questions about Methane Challenge
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Regarding reporting, I'd ask that those members talk to me directly.
Thank you for your follow up on this.
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U.S. Mail Address:

## Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Monday, February 08, 2016 10:56 AM

To: Bylin, Carey < Bylin. Carey@epa.gov >; Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Hi Carey – Thanks again for your outreach on the Methane Challenge technical information for distribution. We would like to take you up on your offer for a dedicated discussion with AGA members. Would it be possible for you to provide a few dates/times that would work for you that I can propose to our members? Also, we may be able to gather a critical mass of members that would want to participate in person, and then have a dial-in/webinar link for remote members. Please let me know if you would be open to this and if you think it would be beneficial. I can then coordinate with the members to see who would be available.

Also, I wanted to follow up with you on your response to Pam's second question regarding partial year data. I believe the concern of some of our members is that they will not be able to start collecting data within 6 months of when they sign up due to the lag time necessary to change internal procedures and external contracts to align with information requested in Methane Challenge. This is particularly challenging for those members that are very interested in being a Founding Partner. They are just not sure that they will be able to collect the necessary data metrics within 6 months of sign up. This may be a situation where the company would need to speak to you directly.

Thanks again for your assistance,

Christine

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]  Sent: Thursday, February 04, 2016 3:44 PM  To: Lacey, Pam < PLacey@aga.org> Cc: Christine Wyman < cwyman@aga.org> Subject: RE: some questions about Methane Challenge
Hi Pam,
Thank you for getting in touch on these points. I've entered answers below in red.
I also wanted to let you know that the Supplemental Technical Information document for Distribution is now on our website. We appreciate your comments and feedback on this and welcome any further questions or discussion. In particular, we are having a webinar in two weeks to discuss the proposal and answer questions, but we are happy to set up a dedicated discussion with AGA members if that would be useful.
Thanks again for your engagement on this, we look forward to continued collaboration.
Best regards,
Carey
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U.S. Mail Address:

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From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, February 03, 2016 5:26 PM
To: Bylin, Carey < Bylin.Carey@epa.gov >
Cc: Christine Wyman < cwyman@aga.org >

Subject: some questions about Methane Challenge

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Pamela A. Lacey   Chief Regulatory Counsel						
Office of General Counsel						
American Gas Association						
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Bylin, Carey Thur 2/18/2016 2:18:16 PM Sent: Subject: RE: some questions about Methane Challenge Hi Christine, SO sorry for the delay on this. This week has totally gotten away from me. How does 3p on Monday, Feb 22 work for you? Please let me know. To confirm, we can plan to come to AGA's offices and have a live and conference call meeting. Alternatively, if you prefer to come here or conduct entirely by conference call that is also fine with us. Thank you for your patience and for your help in setting this up. Best. Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

Christine Wyman[cwyman@aga.org]; Lacey, Pam[PLacey@aga.org]

To:

From:

#### U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Christine Wyman [mailto:cwyman@aga.org]

**Sent:** Tuesday, February 16, 2016 12:02 PM

To: Bylin, Carey <Bylin.Carey@epa.gov>; Lacey, Pam <PLacey@aga.org>

Subject: RE: some questions about Methane Challenge

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#### Christine

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Carey – Based on my call today with AGA members, here is an answer to your question - and some questions to you from us.

1. Yes, the Subpart W definition of Natural Gas Distribution would work for us in Methane Challenge, if as in Subpart W, public utility commission is not initial capped. It would also be helpful to have a short acknowledgment somewhere – perhaps in the FAQ if not in the Technical document – noting that the names of state utility rate regulators vary (some are called public service commissions, or department of public utilities for example). In addition, in some states, utility rates are regulated at the local level. For example, one corporation has several LDCs, and the utility rates of one of their LDCs in Texas are regulated by 93 different cities! [I just learned that this afternoon.] That LDC wants to be sure they don't have to enter into 93 MOUs with EPA. Just explain that all these variously named state and local utility rate

regulators are intended to be covered by the phrase public utility commissions. By the way, it turns out the Subpart NN definition of LDC is inconsistent with Subpart W – because it includes the extra word "state" in front of public utility commission. Now that we know about the home rule local rate regulators, that makes a difference, and the NN version would not work for Methane Challenge where it refers to rate recovery for replacing pipe for example. For your convenience, here is the Subpart W definition:

#### "§98.230 Definition of the source category.

- (a) This source category consists of the following industry segments: ...
- "(8) **Natural gas distribution.** Natural gas distribution means the distribution pipelines and metering and regulating equipment at metering-regulating stations that are operated by a Local Distribution Company (LDC) within a single state that is regulated as a separate operating company **by a public utility commission** or that is operated as an independent municipally-owned distribution system. This segment also excludes customer meters and regulators, infrastructure, and pipelines (both interstate and intrastate) delivering natural gas directly to major industrial users and farm taps upstream of the local distribution company inlet."

**Response**: we hope the definitions we have included in the Framework and Supplemental Technical Information are inclusive, as that is our intent. If there are situations where a specific company has questions about joining or concerns about their inclusion, please direct them to me for discussion.

2. Concern re: flexibility for data gaps for reporting in 2016 partial year – Our members are concerned that they may have only partial data for the first partial year (2016), because it will take more than 6 months to change internal procedures and external contracts (e.g. IT contracts) to align with the information called for in Methane Challenge. They have heard EPA staff say not to worry, that the agency will be flexible. But before they sign up, they would really like to see that assurance in writing somewhere in the Methane Challenge materials.

**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since collection of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and

sign the MOU soon after?
Response: we are looking into this and will follow up with an answer.
4. Can a company with multiple LDCs average pipe mileage across the corporation? That would be most appreciated.
<b>Response</b> : The Framework indicates that partners can select the level at which they join the Program, including individual LDCs or aggregated to the parent or corporate level. The commitment will be related to the operational scope of the entity that joins the partnership, so grouping of LDCs for a single commitment is possible. Framework language is copied below:
Partner Commitment Levels
Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels:
<u>Distribution segment</u> :
• □ □ □ □ □ □ Local distribution company[1] (LDC) within a single state that is regulated as a separate operating company by a public utility commission or that is operated as an independent municipally-owned distribution system; OR
• • • • Parent company or corporate level (e.g., a single commitment that spans multiple LDCs).
I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam

## Pamela A. Lacey | Chief Regulatory Counsel

Office of General Counsel	
American Gas Association	
400 N. Capitol St., NW   Washin	ngton, DC   20001
P: 202-824-7340   M: 202-809-6	5565   F: 202-824-9190   <u>placey@aga.org</u>
	ents more than 200 local energy companies committed to the safe and reliable
delivery of clean natural gas to over 69	Imillion customers throughout the nation.
	•

[1] Local distribution systems whose primary business is to deliver natural gas to residential, commercial and industrial gas consumers.

To: Anand Yegnan (Services - 6)[Anand.Yegnan@dom.com]

From: Bylin, Carey

Sent: Thur 2/18/2016 1:58:06 AM Subject: RE: Methane Challenge

Hi Anand,

Thank you for getting in touch. I left you a message earlier today and definitely would like to find a time to talk. I will call you Thursday morning.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



Sent: Wednesday, February 17, 2016 5:00 PM
To: Bylin, Carey <Bylin.Carey@epa.gov>
Subject: Methane Challenge

Hello Ms. Bylin —

As we are evaluating the Methane Challenge proposal, I had some questions which I was hoping to get clarification. I wanted to check your availability for a brief call.

Please let me know if there is any time when we could discuss.

Thank you.

Regards,

Anand

From: Anand Yegnan (Services - 6) [mailto:Anand.Yegnan@dom.com]

**CONFIDENTIALITY NOTICE:** This electronic message contains information which may be legally confidential and or privileged and does not in any case represent a firm ENERGY COMMODITY bid or offer relating thereto which binds the sender without an additional express written confirmation to that effect. The information is intended solely for the individual or entity named above and access by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this information is prohibited and may be unlawful. If you have received this electronic transmission in error, please reply immediately to the sender that you have received the message in error, and delete it. Thank you.

To: Lacey, Pam[PLacey@aga.org]

Cc: Christine Wyman[cwyman@aga.org]; O'Shea, Jennifer[joshea@aga.org]

From: Bylin, Carey

**Sent:** Tue 2/16/2016 10:32:21 PM

Subject: Re: Methane Challenge Launch - Who Should Come?

Hi Pam,

They will likely not confirm until close to the event, which would probably not leave enough time for partners to secure high level participation. I would suggest potential partners request commensurate participation, and they can make adjustments if needed when we confirm. Just a suggestion.

Yes, while final details are also to be confirmed, we do envision a photo opportunity.

Let me know if you have further questions.

Carey Bylin

On Feb 16, 2016, at 5:22 PM, Lacey, Pam < PLacey@aga.org > wrote:

Hi Carey – OK - Please let me know when they confirm so I can alert the companies for their travel plans (CEO or VPs). Do you envision some sort of ceremony or photo op? Thanks! – Pam

#### Pamela A. Lacey | Chief Regulatory Counsel

#### Office of General Counsel

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, February 16, 2016 5:19 PM

To: Lacey, Pam < PLacey@aga.org>

Cc: Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>>

Subject: Re: Methane Challenge Launch - Who Should Come?

Hi Pam,

Thanks for checking in on this. We have invited the Administrator and the Acting Assistant Administrator for Air but their participation is still to be confirmed. Please let me know if you have any other questions.

Carey Bylin

On Feb 12, 2016, at 5:56 PM, Lacey, Pam < PLacey@aga.org > wrote:

Hi Carey - When you get back to the office after the long weekend, would you please advise us what level company rep is appropriate for the Methane Challenge Founding Partners ceremony on March 29?

Will this be an event for CEOs and the EPA Administrator? Or should companies send VPs or Directors? They will need to know for planning.

Thanks! And enjoy the long weekend! I'm on my way to WV for family skiing. - Pam

Sent from my Verizon Wireless 4G LTE smartphone

Cc: Christine Wyman[cwyman@aga.org]
To: Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Tue 2/16/2016 10:19:00 PM

Subject: Re: Methane Challenge Launch - Who Should Come?

Hi Pam,

Thanks for checking in on this. We have invited the Administrator and the Acting Assistant Administrator for Air but their participation is still to be confirmed. Please let me know if you have any other questions.

Carey Bylin

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Will this be an event for CEOs and the EPA Administrator? Or should companies send VPs or Directors? They will need to know for planning.

Thanks! And enjoy the long weekend! I'm on my way to WV for family skiing. - Pam

Sent from my Verizon Wireless 4G LTE smartphone

To: Christine Wyman[cwyman@aga.org]
Cc: Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Tue 2/16/2016 9:30:08 PM

Subject: Re: some questions about Methane Challenge

Hi Christine,

My apologies for the delay in getting back to you on this. I have left for the day but will take a look first thin tomorrow and proposed some times that work for us.

Carey Bylin

On Feb 16, 2016, at 12:02 PM, Christine Wyman < cwyman@aga.org > wrote:

Hi Carey – I just wanted to follow up on the AGA meeting. We're happy to limit this to a call if that provides you more flexibility in finding a time. Given than, we're available anytime on Friday, February 19, anytime except from 1 pm-2pm on February 22 and anytime on February 24. If possible, given than many of our members are in the Midwest and West Coast, late morning/afternoon would be best.

Many thanks for your assistance in scheduling this.

Christine

From: Christine Wyman

Sent: Wednesday, February 10, 2016 3:50 PM

To: 'Bylin, Carey' <Bylin.Carey@epa.gov>; Lacey, Pam <PLacey@aga.org>

Subject: RE: some questions about Methane Challenge

Hi Carey – I've listed AGA's availability to host a meeting on February 19, 22 and 24. Hopefully some of these times also will work with your schedules.

Also, I've reached out to our members to gauge availability for the meetings. I've had a great response for interest, but I believe most members will need to participate by phone.

limit this to a call, that is an option as well. February 19: available all day February 22: available from 8 a.m. until 11:30 a.m.; 2 p.m. -5 p.m. February 24: available from 8 a.m. until 11:30 a.m.; 2 p.m. – 5 p.m. Thanks, Christine From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Tuesday, February 09, 2016 5:29 PM **To:** Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>; Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a>> Subject: RE: some questions about Methane Challenge Hi Christine, Okay, thanks for the follow up. It is helpful to know that the preference is to organize the meeting after the 18th. The 19th, 22nd, or 24th look good preliminarily. If those generally work on your end I'll check internally and come back to you with some specific time proposals. We are happy to come to AGA's offices for the meeting.

Pam and I are both here in DC and would appreciate meeting in person, but if we need to

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 09, 2016 5:02 PM

**To:** Bylin, Carey < Bylin. Carey@epa.gov >; Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Carey – Thanks so much. I think that 1 hour should be sufficient.

As to the location, we would like the ability to conference in those members who cannot attend in person. We have that capability at AGA. If you do as well, then we're happy to meet wherever is most convenient for you.

I know that our members are eager to learn more about the program and ask questions, but perhaps it would make sense to schedule the AGA meeting after the February 18 webinar?

That way the AGA meeting can focus on questions that our members have that were not addressed through the webinar.

If you have a general sense on what week(s) you're thinking, I can poll our members to get a better sense of who would be able to attend the meeting. Many of our members are not local, so they would need to either be in town or have available travel budgets, etc, in order to make the trip.

-Christine

### **Christine Wyman | Senior Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7120 | F: 202-824-9130 | cwyman@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to nearly 69 million customers throughout the nation.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, February 09, 2016 4:40 PM

**To:** Christine Wyman < <u>cwyman@aga.org</u>>; Lacey, Pam < <u>PLacey@aga.org</u>>

**Subject:** RE: some questions about Methane Challenge

Hi Christine,

Okay, great, arranging a dedicated meeting sounds good. I assume then that we should plan to come to AGA? Or would you like to come to EPA? Also, how long do you think we will need? Is an hour sufficient or should we reserve two? This will help me as I look at our availabilities.

Regarding reporting, I'd ask that those members talk to me directly. Thank you for your follow up on this. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address: Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

From: Christine Wyman [mailto:cwyman@aga.org]

**Sent:** Monday, February 08, 2016 10:56 AM

<image001.gif>

To: Bylin, Carey < Bylin. Carey@epa.gov >; Lacey, Pam < PLacey@aga.org >

Subject: RE: some questions about Methane Challenge

Hi Carey – Thanks again for your outreach on the Methane Challenge technical information for distribution. We would like to take you up on your offer for a dedicated discussion with AGA members. Would it be possible for you to provide a few dates/times that would work for you that I can propose to our members? Also, we may be able to gather a critical mass of members that would want to participate in person, and then have a dial-in/webinar link for remote members. Please let me know if you would be open to this and if you think it would be beneficial. I can then coordinate with the members to see who would be available.

Also, I wanted to follow up with you on your response to Pam's second question regarding partial year data. I believe the concern of some of our members is that they will not be able to start collecting data within 6 months of when they sign up due to the lag time necessary to change internal procedures and external contracts to align with information requested in Methane Challenge. This is particularly challenging for those members that are very interested in being a Founding Partner. They are just not sure that they will be able to collect the necessary data metrics within 6 months of sign up. This may be a situation where the company would need to speak to you directly.

Thanks again for your assistance,

Christine

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Thursday, February 04, 2016 3:44 PM

To: Lacey, Pam < PLacey@aga.org>

Cc: Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>>

Subject: RE: some questions about Methane Challenge

Hi Pam,

I also wanted to let you know that the Supplemental Technical Information document for Distribution is now on our website. We appreciate your comments and feedback on this and welcome any further questions or discussion. In particular, we are having a webinar in two weeks to discuss the proposal and answer questions, but we are happy to set up a dedicated discussion with AGA members if that would be useful.

Thanks again for your engagement on this, we look forward to continued collaboration.

Best regards,

Carey

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

#### U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, February 03, 2016 5:26 PM
To: Bylin, Carey < Bylin. Carey@epa.gov >
Cc: Christine Wyman < cwyman@aga.org >

Subject: some questions about Methane Challenge

Carey – Based on my call today with AGA members, here is an answer to your question - and some questions to you from us.

Yes, the Subpart W definition of Natural Gas Distribution would work for us in Methane Challenge, if as in Subpart W, public utility commission is not initial capped. It would also be helpful to have a short acknowledgment somewhere – perhaps in the FAQ if not in the Technical document – noting that the names of state utility rate regulators vary (some are called public service commissions, or department of public utilities for example). In addition, in some states, utility rates are regulated at the local level. For example, one corporation has several LDCs, and the utility rates of one of their LDCs in Texas are regulated by 93 different cities! [I just learned that this afternoon.] That LDC wants to be sure they don't have to enter into 93 MOUs with EPA. Just explain that all these variously named state and local utility rate regulators are intended to be covered by the phrase public utility commissions. By the way, it turns out the Subpart NN definition of LDC is inconsistent with Subpart W – because it includes the extra word "state" in front of public utility commission. Now that we know about the home rule local rate regulators, that makes a difference, and the NN version would not work for Methane Challenge where it refers to rate recovery for replacing pipe for example. For your convenience, here is the Subpart W definition:

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- (a) This source category consists of the following industry segments: ...
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**public utility commission** or that is operated as an independent municipally-owned distribution system. This segment also excludes customer meters and regulators, infrastructure, and pipelines (both interstate and intrastate) delivering natural gas directly to major industrial users and farm taps upstream of the local distribution company inlet."

**Response**: we hope the definitions we have included in the Framework and Supplemental Technical Information are inclusive, as that is our intent. If there are situations where a specific company has questions about joining or concerns about their inclusion, please direct them to me for discussion.

2. Concern re: flexibility for data gaps for reporting in 2016 partial year – Our members are concerned that they may have only partial data for the first partial year (2016), because it will take more than 6 months to change internal procedures and external contracts (e.g. IT contracts) to align with the information called for in Methane Challenge. They have heard EPA staff say not to worry, that the agency will be flexible. But before they sign up, they would really like to see that assurance in writing somewhere in the Methane Challenge materials.

**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since <u>collection</u> of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer.

4. Can a company with multiple LDCs average pipe mileage across the corporation? That would be most appreciated.

**Response**: The Framework indicates that partners can select the level at which they join the Program, including individual LDCs or aggregated to the parent or corporate level. The commitment will be related to the operational scope of the entity that joins the partnership, so grouping of LDCs for a single commitment is possible. Framework language is copied below:

Partner Commitment Levels

Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels:

#### **Distribution segment:**

• DDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDDD
a separate operating company by a public utility commission or that is operated as an
independent municipally-owned distribution system; OR

<ul><li>□□□□□□□□□ Parent company</li></ul>	or corporate	level (e.g.,	a single	commitment	that spans
multiple LDCs).					

I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam

Pamela A. Lacey | Chief Regulatory Counsel

**Office of General Counsel** 

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

reliable delivery	of clean natural	gas to over 69 mill	ion customers thro	companies committughout the nation.	ed to the
		_			
		_			
		_			

**To:** Donatiello, Steven T.[Steven.Donatiello@thelacledegroup.com]

**Cc:** GHGreporting[GHGreporting@epa.gov]; Pryor, Justin[Pryor.Justin@epa.gov]

From: Bylin, Carey

**Sent:** Tue 2/16/2016 8:50:41 PM

Subject: Re: Methane Challenge Webinar Conflicts with GHG Seminar

Hi Steve,

Thanks for getting in touch on this. We understand that the GHGRP webinar will be repeated on February 25, as such we plan to keep our Methane Challenge webinar as planned. I hope you will be able to join us for that.

Best,

Carey Bylin

On Feb 16, 2016, at 9:44 AM, Donatiello, Steven T. < Steven. Donatiello athelaclede group.com > wrote:

Carey,

Both are at 1 pm eastern on the 18th. Can somebody change theirs?

# Steve

Steve Donatiello, P.E.

Environmental Engineer III

Laclede Gas Company

**Environmental Compliance** 

3rd Floor

700 Market Street \*\*\*I have a new address.\*\*\*

St. Louis, MO 63101

steven.donatiello@TheLacledeGroup.com

314-658-5541

314-307-5948 (cell) \*\*\*I have a new cell phone number.\*\*\*
314-535-9414 (fax)
<image003.jpg>

**To:** Chahbazpour, Donald[Donald.Chahbazpour@nationalgrid.com]

From: Bylin, Carey

**Sent:** Fri 2/12/2016 7:08:44 PM **Subject:** RE: Got your voice message

MC Partnership Agreement 1-15-16 - Final 508 - 2-2-16-LDCs.docx

Hi Don,

Great to talk to you the other day. We are very excited that National Grid plans to make the Methane Challenge BMP commitment. As a follow up to our discussion, attached is a Word version of the Partnership Agreement, with some proposed changes to the commitment table. We added some lines under the Mains commitment to indicate the individual LDCs and their respective rate. A similar thing could be done under any of the others that you choose to split up, or you could make the other commitments at the corporate level (e.g. per our discussion of blowdowns). Would this work for you?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



To: Bylin, Carey <Bylin.Carey@epa.gov> Subject: RE: Got your voice message Forgot to mention that I'm available any time after 3:30 today if you would like to call me (cell # Ex.6-Personal Privacy Don From: Chahbazpour, Donald Sent: Wednesday, February 10, 2016 11:53 AM To: 'bylin.carey@epa.gov' Subject: Got your voice message Hi Carey, Got your voice message, thank you. I tried calling you back but you are not available. Please let me know when is a good time to give you a quick call and we can catch up for a few minutes. Thanks, Don

From: Chahbazpour, Donald [mailto:Donald.Chahbazpour@nationalgrid.com]

Sent: Wednesday, February 10, 2016 11:55 AM

Donald Chahbazpour

Director, Climate Change Compliance

nationalgrid

One MetroTech Center, 14<sup>th</sup> Floor

Brooklyn, NY 11201

Donald.Chahbazpour@nationalgrid.com

Tel: 929-324-4848

Mob: Ex. 6 - Personal Privacy

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http://www.nationalgrid.com/corporate/legal/registeredoffices.htm





# Natural Gas STAR Methane Challenge Program: Partnership Agreement for Best Management Practice (BMP) Commitment

The Natural Gas STAR Methane Challenge Program is a flexible, voluntary partnership between the U.S. Environmental Protection Agency (EPA) and oil and natural gas companies. This voluntary Program allows the EPA to collaborate with Partners to promote and track ambitious, transparent commitments to voluntarily reduce methane emissions beyond regulatory requirements and to recognize Partners for their progress. By signing this agreement, \_\_\_\_\_\_ (company name) agrees to join the U.S. EPA to reduce methane emissions through a Best Management Practice (BMP) Commitment. The BMP Commitment entails a Partner commitment to company-wide implementation of BMPs to reduce methane emissions from key sources by a future target date. Partners commit to at least one emission source and specify a target year of completion (maximum of five [5] years from commitment start date).

Partner's Best Management Practice Commitment: Please specify participating sources, start date, and target achievement year in the table below; check all that apply.

Source Onshore Production	Start Date	Achievement Year
Pneumatic Controllers		
Equipment Leaks/Fugitive Emissions		
Liquids Unloading		Laurence Control of the Control of t
Pneumatic Pumps	·	
Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
Gathering and Boosting	ARCHAN S. Co.	
Pneumatic Controllers		
Equipment Leaks/Fugitive Emissions	without the control of the control o	
Pneumatic Pumps		
Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks	***************************************	
Reciprocating Compressors - Rod Packing Vent	NATIONAL PROPERTY OF THE STATE	
Centrifugal Compressors - Venting		
Natural Gas (NG) Processing		
Reciprocating Compressors - Rod Packing Vent		
Centrifugal Compressors - Venting		
NG Transmission & Underground Stora	ge	
Reciprocating Compressors - Rod Packing Vent		
Centrifugal Compressors - Venting	130xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	
Equipment Leaks/Fugitive Emissions		
Transmission Pipeline Blowdowns between Compressor Stations	***************************************	
Pneumatic Controllers		***************************************





NG Distribution			
	M&R Stations/City Gates		
	Mains – Cast Iron and Unprotected Steel (Commitment Rate:)		
	LDC #1 (Commitment Rate:)		
	LDC #2 (Commitment Rate:)		
	LDC #3 (Commitment Rate:)		
	LDC #4 (Commitment Rate:)		
	LDC #5 (Commitment Rate:)		
	LDC #6 (Commitment Rate:)		
	Services – Cast Iron and Unprotected Steel		
	Distribution Pipeline Blowdowns (Commitment Rate:)		
	Excavation Damages		

# **EPA's Responsibilities**

- 1. Assign a Methane Challenge Program Representative responsible for assisting the Partner in implementing the Program.
- 2. Provide relevant Program details, which can be found in the Natural Gas STAR Methane Challenge Program: BMP Framework and Methane Challenge BMP Supplemental Technical Information documents.
- 3. Assist Partners with Program implementation by:
  - (i) providing relevant technical information;
  - (ii) developing a mechanism for reporting supplemental information;
  - (iii) updating Program information as needed, including updating the list of participating sources and mitigation options covered in the Program; and
  - (iv) answering questions about Program participation.
- 4. Encourage new and innovative methane emission mitigation technologies, as well as methodologies for monitoring and measuring progress, and incorporate them into the Program.
- 5. Track Partner progress through provision of a user-friendly reporting system through which Partners can report supplementary data relevant to achieving their Methane Challenge commitments. Supplementary data will be used in conjunction with data that are already collected by Subpart W of the Greenhouse Gas Reporting Program (GHGRP) to track Partner progress.
- 6. Promote the transparency and visibility of the Methane Challenge Program and member commitments and achievements, by publicly releasing non-confidential data that is submitted either through the Methane Challenge Program or through the GHGRP.
- 7. Acknowledge Program Partners through announcement of commitments, Implementation Plans, progress, and achievement of goals on the EPA's Methane Challenge website.

# Natural Gas STAR Methane Challenge Partner's Responsibilities

- 1. Designate a company representative as the Natural Gas STAR Methane Challenge Program Implementation Manager responsible for serving as the contact point concerning implementation of this voluntary agreement.
- 2. Submit an Implementation Plan within six (6) months of signing this agreement outlining expected activities and milestones for achieving commitments.
- 3. Specify commitment start date(s), which will be within six (6) months of joining the Program.
- 4. Implement BMPs for the selected participating sources across company operations to achieve mitigation commitments by the specified commitment target year, not to exceed five (5) years from the specified commitment start date.





- 5. Report on an annual basis non-CBI supplementary data relevant to achieving Methane Challenge commitments, as outlined in Program documents. Supplementary data will be used in conjunction with data collected by Subpart W of the GHGRP to demonstrate Partner progress within the Program.
- 6. Communicate participation to employees.

### **General Terms**

- 1. This voluntary partnership is intended to promote and recognize voluntary actions taken by oil and gas companies to reduce methane emissions from their operations. It is understood that Partners to this Program may have operations covered by federal, state, and/or other regulatory requirements. It is anticipated that Partners may achieve their Methane Challenge Program commitments through a combination of voluntarily-and regulatorily-driven actions. Participation in this Program does not in any way change legal obligations of Partners to comply with applicable laws regulations.
- 2. This agreement can be terminated by either party at any time, with no notice or penalties and no further obligation. The EPA agrees not to publicize a Partner's withdrawal from the Program beyond removing the Partner's name from Methane Challenge website. By setting out a target date on this form the Company does not intend to expose itself to regulatory liability if it cannot meet the target date.
- 3. The Partner agrees that the activities it undertakes connected with this Partnership Agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
- 4. The Partner agrees that it will not claim or imply that its participation in the Program constitutes the EPA approval or endorsement of anything other than the commitment to the Program. The Partner cannot use or appropriate the EPA seal or identifier in any way.
- 5. In order to maintain status as a Partner in the Methane Challenge Program, the Partner agrees to annually report specified supplemental data, per Program reporting specifications.
- 6. If the Partner is unable to meet a BMP commitment by the target year, and intends to remain in the Program, the Partner company will provide relevant contextual information for the delay and set a new target year. The EPA will note the adjustment to the implementation timeline on the Methane Challenge website.
- 7. All commitments made by the EPA in this Partnership Agreement are subject to the availability of appropriated funds. Nothing in this Partnership Agreement, in and of itself, obligates the EPA to expend appropriations or to enter into any contract, assistance agreement, interagency agreement, or incur other financial obligations that would be inconsistent with Agency budget priorities. This Partnership Agreement does not exempt the Partner from the EPA policies governing competition for assistance agreements. Any transaction involving reimbursement or contribution of funds between the parties to this Partnership Agreement will be handled in accordance with applicable laws, regulations, and procedures under separate written agreements.

# **Signatures and Partner Contact Details**

Authorized Comp	pany Representative:	(name)				
Signature:				Date:		
Authorized U.S.	EPA Representative: Pa	nul M. Gunning, Dir	ector, Climate	e Change Div	rision	
Signature:				Date:		
_	ated Natural Gas STA	R Methane Challen	nge Implemen		ager:	
Partner's Design	ated Natural Gas STA	R Methane Challer	nge Implemer		ager:	





City/State/Zip:		
Telephone/Fax:	E-mail:	
Instructions		

Please send this form to: Natural Gas STAR Methane Challenge Program

Standard Mail: Mail Code 6207M

1200 Pennsylvania Ave NW Washington DC 20460

Overnight Mail: 1201 Constitution Ave NW, Room Number 4353 UU

Washington DC 20004

To: Christine Wyman[cwyman@aga.org]; Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Tue 2/9/2016 10:28:39 PM

Subject: RE: some questions about Methane Challenge

Hi Christine,

Okay, thanks for the follow up. It is helpful to know that the preference is to organize the meeting after the 18<sup>th</sup>. The 19<sup>th</sup>, 22<sup>nd</sup>, or 24<sup>th</sup> look good preliminarily. If those generally work on your end I'll check internally and come back to you with some specific time proposals. We are happy to come to AGA's offices for the meeting.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Tuesday, February 09, 2016 5:02 PM

To: Bylin, Carey <Bylin.Carey@epa.gov>; Lacey, Pam <PLacey@aga.org>

Subject: RE: some questions about Methane Challenge

Carey – Thanks so much. I think that 1 hour should be sufficient.

As to the location, we would like the ability to conference in those members who cannot attend in person. We have that capability at AGA. If you do as well, then we're happy to meet wherever is most convenient for you.

I know that our members are eager to learn more about the program and ask questions, but perhaps it would make sense to schedule the AGA meeting after the February 18 webinar? That way the AGA meeting can focus on questions that our members have that were not addressed through the webinar.

If you have a general sense on what week(s) you're thinking, I can poll our members to get a better sense of who would be able to attend the meeting. Many of our members are not local, so they would need to either be in town or have available travel budgets, etc, in order to make the trip.

-Christine

**Christine Wyman | Senior Counsel** 

American Gas Association

P: 202-824-7120 | F: 202-824-9130 | cwyman@aga.org The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to nearly 69 million customers throughout the nation. From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Tuesday, February 09, 2016 4:40 PM **To:** Christine Wyman < <a href="mailto:cwyman@aga.org">cwyman@aga.org</a>; Lacey, Pam < <a href="mailto:PLacey@aga.org">PLacey@aga.org</a>> Subject: RE: some questions about Methane Challenge Hi Christine, Okay, great, arranging a dedicated meeting sounds good. I assume then that we should plan to come to AGA? Or would you like to come to EPA? Also, how long do you think we will need? Is an hour sufficient or should we reserve two? This will help me as I look at our availabilities. Regarding reporting, I'd ask that those members talk to me directly. Thank you for your follow up on this. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative

400 N. Capitol St., NW | Washington, DC | 20001

### U.S. Environmental Protection Agency

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Monday, February 08, 2016 10:56 AM

**To:** Bylin, Carey <<u>Bylin, Carey@epa.gov</u>>; Lacey, Pam <<u>PLacey@aga.org</u>>

Subject: RE: some questions about Methane Challenge

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Thanks again for your engagement on this, we look forward to continued collaboration.
Best regards,

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#### Carey

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Sent: Wednesday, February 03, 2016 5:26 PM
To: Bylin, Carey < Bylin.Carey@epa.gov >
Cc: Christine Wyman < cwyman@aga.org >

•

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3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer.

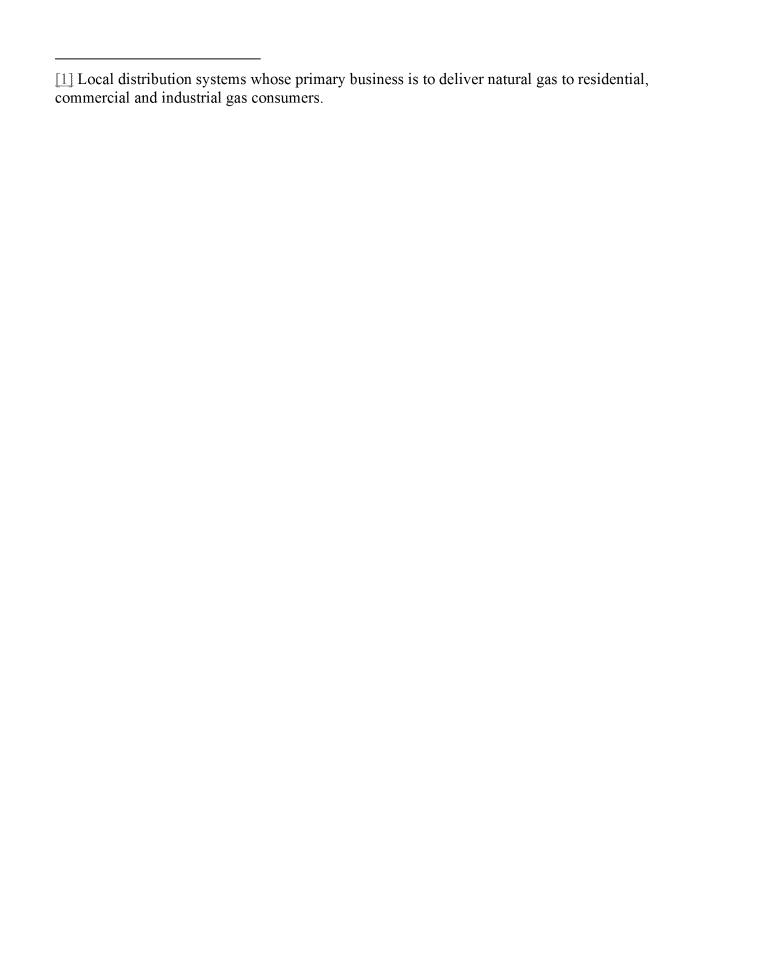
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Partner Commitment Levels

Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels:

Distribution segment:
• □ □ □ □ □ □ Local distribution company [1] (LDC) within a single state that is regulated as a separate operating company by a public utility commission or that is operated as an independent municipally-owned distribution system; OR
•□□□□□□□□□□□ Parent company or corporate level (e.g., a single commitment that spans multiple LDCs).
I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam
Pamela A. Lacey   Chief Regulatory Counsel
Office of General Counsel
American Gas Association
400 N. Capitol St., NW   Washington, DC   20001
P: 202-824-7340   M: 202-809-6565   F: 202-824-9190   <u>placey@aga.org</u>
The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.



To: Christine Wyman[cwyman@aga.org]; Lacey, Pam[PLacey@aga.org] From: Bylin, Carey Tue 2/9/2016 9:40:11 PM Sent: Subject: RE: some questions about Methane Challenge Hi Christine, Okay, great, arranging a dedicated meeting sounds good. I assume then that we should plan to come to AGA? Or would you like to come to EPA? Also, how long do you think we will need? Is an hour sufficient or should we reserve two? This will help me as I look at our availabilities. Regarding reporting, I'd ask that those members talk to me directly. Thank you for your follow up on this. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative

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Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

## Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Christine Wyman [mailto:cwyman@aga.org]

Sent: Monday, February 08, 2016 10:56 AM

To: Bylin, Carey <Bylin.Carey@epa.gov>; Lacey, Pam <PLacey@aga.org>

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Thanks again for your assistance,

Christine

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Thanks again for your engagement on this, we look forward to continued collaboration.
Best regards,
Carey
Ms. Carey Bylin
International Programs Leader, Oil and Gas

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Sent: Wednesday, February 03, 2016 5:26 PM
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Cc: Christine Wyman < cwyman@aga.org >

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I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine Wyman, who will be here in the office tomorrow. Thank you! - Pam

Pamela A. Lacey   Chief Regulatory Coun
---

#### **Office of General Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

[1] Local distribution systems wh	hose primary	business is to	deliver natural	gas to residentia
commercial and industrial gas co	nsumers			

To: Nate Teti[ntet@statoil.com]

From: Bylin, Carey

**Sent:** Mon 2/8/2016 2:33:21 PM

Subject: RE: Hi

Hi Nate,

Thank you for getting in touch. Yes, it would be great to talk to you about Methane Challenge. How does tomorrow look for you?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

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U.S. Mail Address:



From: Nate Teti [mailto:ntet@statoil.com]
Sent: Thursday, February 04, 2016 4:13 PM
To: Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Hi

Hi Carey,

Hope all is well. I was wondering if you have some time in the near future to discuss EPA's methane challenge. Thanks

Nate

Nate Teti Vice President, Communications DPUSA COM Statoil North America, Inc.

Mobile: Ex.6 - Personal Privacy
Telephone: +1 713 485 2606
Email: ntet@statoil.com

Visitor address: Building 4, 8th Floor2101 CityWest Boulevard, USA

Incorporation number: 2125856

www.statoil.com

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Thank you

To: Cc: From: Sent: Subject:	Lacey, Pam[PLacey@aga.org] Christine Wyman[cwyman@aga.org] Bylin, Carey Thur 2/4/2016 8:44:27 PM RE: some questions about Methane Challenge
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**Response**: In the Framework document we state "Partners will begin collecting relevant annual report data on their designated start date. Program reporting will be due annually each spring (on a date to be specified by the EPA), beginning the following spring after their start date. "Since <u>collection</u> of data is not expected until their start date, which can be six months after they sign up, we believe it is clear that partial year information on the first year is acceptable.

3. March 29-30, 2016 Launch Date for Founding Partners – Must the company sign the MOU by then? Or can a company have it in the works and get legal reviews completed and sign the MOU soon after?

**Response**: we are looking into this and will follow up with an answer. Can a company with multiple LDCs average pipe mileage across the corporation? That would be most appreciated. **Response**: The Framework indicates that partners can select the level at which they join the Program, including individual LDCs or aggregated to the parent or corporate level. The commitment will be related to the operational scope of the entity that joins the partnership, so grouping of LDCs for a single commitment is possible. Framework language is copied below: Partner Commitment Levels Partners may join the Program at the appropriate company level depending upon the industry segment. EPA encourages Partners to make the broadest possible commitments, ideally including all U.S. onshore operations in their commitments. For each segment, Partners may join the Program at one of the following levels: Distribution segment: • \textsup \ separate operating company by a public utility commission or that is operated as an independent municipally-owned distribution system; OR • \ Parent company or corporate level (e.g., a single commitment that spans multiple LDCs). I will be on a plane tomorrow from 7 am to around 1:30 pm Eastern, but you can reach me this

evening or tomorrow afternoon. I have also copied my colleague, Senior Counsel Christine

Wyman, who will be here in the office tomorrow. Thank you! - Pam

# Pamela A. Lacey | Chief Regulatory Counsel

#### **Office of General Counsel**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to over 69 million customers throughout the nation.

<sup>[1]</sup> Local distribution systems whose primary business is to deliver natural gas to residential, commercial and industrial gas consumers.

To: Brian Jones[bjones@mjbradley.com]

From: Bylin, Carey

**Sent:** Wed 2/3/2016 6:30:11 PM

Subject: RE: Touch Base on Methane Challenge?

Thanks for the reply. I have a conflict at 2p but could talk now in case that works. Other than that I am wide open in the morning.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Brian Jones [mailto:bjones@mjbradley.com]

**Sent:** Wednesday, February 03, 2016 1:19 PM **To:** Bylin, Carey <Bylin.Carey@epa.gov>

Subject: RE: Touch Base on Methane Challenge?

Hi Carey,

How about at 2 today?

Thanks

Brian

Brian M. Jones

Senior Vice President

M.J. Bradley & Associates, LLC

47 Junction Square Drive

Concord, MA 01742

Main: 978-369-5533 | Direct: 978-405-1269

www.mjbradley.com



This transmission may contain information that is confidential or legally privileged and is intended solely for the addressee. If you are not the intended recipient, please do not use the information in this e-mail, including any attachment(s), in any way; delete this e-mail, and immediately contact the sender. Thank you for your cooperation.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]
Sent: Wednesday, February 03, 2016 12:39 PM
To: Brian Jones <br/>
Spiones@mjbradley.com>

Subject: Touch Base on Methane Challenge?

Hi Brian,

I was hoping to find a time to talk to you about our Methane Challenge distribution segment Supplemental Technical Information document. Do you have any time today or tomorrow to chat?

\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

To: Brian Jones[bjones@mjbradley.com]

From: Bylin, Carey

**Sent:** Wed 2/3/2016 5:39:20 PM

Subject: Touch Base on Methane Challenge?

Hi Brian,

I was hoping to find a time to talk to you about our Methane Challenge distribution segment Supplemental Technical Information document. Do you have any time today or tomorrow to chat?

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

To: Howard Feldman[Feldman@api.org]

From: Bylin, Carey

**Sent:** Thur 1/21/2016 7:34:55 PM

**Subject:** Methane Challenge BMP Commitment Option

Per our conversation, this is now on our website:

http://www3.epa.gov/gasstar/methanechallenge/index.html

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



To: Brian Jones[bjones@mjbradley.com]

From: Bylin, Carey

Sent: Wed 1/13/2016 6:12:14 PM Subject: RE: Time to Connect

Hi Brian,

Happy new year. Yes, sure, when would work for you? Maybe 2:30p today? Or 9:30a tomorrow?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Brian Jones [mailto:bjones@mjbradley.com]

**Sent:** Wednesday, January 13, 2016 9:16 AM **To:** Bylin, Carey <Bylin.Carey@epa.gov>

**Subject:** Time to Connect

Hi Carey

I hope you enjoyed the Holidays with your family. Do you have time to connect by phone in the next few days to chat about next steps on the Methane Challenge?

Thanks

Brian

Brian M. Jones

Senior Vice President

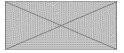
M.J. Bradley & Associates, LLC

47 Junction Square Drive

Concord, MA 01742

Main: 978-369-5533 | Direct: 978-405-1269

www.mjbradley.com



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you for your cooperation.

From: Bylin, Carey

Location: Call in number is Ex. 6 - Personal Privacy passcode - Ex. 6 - Personal Privacy

Importance: Normal

Subject: Accepted: Conference Call with EPA Methane Challenge Staff

**Start Date/Time:** Wed 1/6/2016 5:00:00 PM **End Date/Time:** Wed 1/6/2016 6:00:00 PM From: Bylin, Carey

**Location:** Marzia's Office (5119)

Importance: Normal

**Subject:** Accepted: Conference Call with EPA Methane Challenge Staff **Start Date/Time:** Wed 1/6/2016 5:00:00 PM

End Date/Time: Wed 1/6/2016 5:00:00 PM Wed 1/6/2016 6:00:00 PM

**To:** Kurtovich, Martin[Martin.Kurtovich@cpuc.ca.gov]

Cc: Pryor, Justin[Pryor.Justin@epa.gov]; Waltzer, Suzanne[Waltzer.Suzanne@epa.gov]; Zafar,

Marzia[marzia.zafar@cpuc.ca.gov]; O'Donnell, Arthur J.[Arthur.O'Donnell@cpuc.ca.gov]

From: Bylin, Carey

**Sent:** Thur 12/17/2015 4:47:27 PM

Subject: RE: Methane Challenge Comments Submitted

Hello Martin,

Thank you for the reply. It would be best for us to meet after the holidays. Taking into account the time difference, here are our availabilities:

- Tues 1/5: 11a-1p (Eastern)

Wed 1/6: 12p (Eastern)

Thurs 1/7: 11a-2p (Eastern)

Would any of those work for you?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

#### U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Kurtovich, Martin [mailto:Martin.Kurtovich@cpuc.ca.gov]

**Sent:** Monday, December 14, 2015 7:47 PM **To:** Bylin, Carey <Bylin.Carey@epa.gov>

Cc: Pryor, Justin <Pryor.Justin@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>;

Zafar, Marzia <marzia.zafar@cpuc.ca.gov>; O'Donnell, Arthur J.

<Arthur.O'Donnell@cpuc.ca.gov>

Subject: RE: Methane Challenge Comments Submitted

## Carey

We would like to talk to you to hear about current activities with EPA's methane challenge and compare with our current efforts to develop new regulations for methane emissions from natural gas distribution systems in California. Art O'Donnell from our Safety and Enforcement Division is leading this effort and will be included along with Marzia Zafar who is the Director of our Policy and Planning Division.

Let me know when you're available and then I'll coordinate on this end.

Regards,

Martin Kurtovich

Policy and Planning Division



# http://docs.cpuc.ca.gov

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Thursday, December 10, 2015 10:25 AM To: Kurtovich, Martin Cc: Pryor, Justin; Waltzer, Suzanne Subject: FW: Methane Challenge Comments Submitted
Hello Martin,
I hope you are doing well. Thank you very much for contacting us about the Methane Challenge program; my apologies for the delay in getting back to you.
It is great to hear of California's effort and I hope that I am not too late in responding to your request. We would very much like to talk to you about potential synergies in our programs, would you be available to set up a discussion in the coming week?
Best,
Carey
Mo Carou Bulia
Ms. Carey Bylin
International Programs Leader, Oil and Gas
Natural Gas STAR Program
Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: gasstar-admin@domain.invalid [mailto:gasstar-admin@domain.invalid]

Sent: Friday, September 18, 2015 1:11 PM

To: younus.burhan@tetratech.com

Cc: Bylin, Carey < Bylin. Carey@epa.gov>

Subject: Methane Challenge Comments Submitted

The following comments were submitted to the Natural Gas STAR Methane Challenge website.

Record ID: 11

**Timestamp:** 09/18/15 12:10 PM

Name:

Martin Kurtovich

Email:

# martin.kurtovich@cpuc.ca.gov

# Organization:

California Public Utilities Commission

City:

San Francisco

State:

CA

#### **Comments:**

In 2014, the California State legislature passed Senate Bill 1371 which tasks the California Public Utilities Commission with the development of a program to address fugitive methane emissions from California's natural gas transmission and distribution systems. This will entail developing a leak detection and repair program as well as new monitoring and reporting requirements. These efforts seem very similar to the Methane Challenge. Would EPA be interested in partnering with the State of California to develop both programs concurrently?

#### **Attachment:**

None

View comments online at the Natural Gas STAR Methane Challenge feedback tool.

Cc: Pryor, Justin[Pryor.Justin@epa.gov]; Suzanne Waltzer[Waltzer.Suzanne@epa.gov] From: Bylin, Carey Sent: Thur 12/10/2015 6:25:03 PM Subject: FW: Methane Challenge Comments Submitted Hello Martin, I hope you are doing well. Thank you very much for contacting us about the Methane Challenge program; my apologies for the delay in getting back to you. It is great to hear of California's effort and I hope that I am not too late in responding to your request. We would very much like to talk to you about potential synergies in our programs, would you be available to set up a discussion in the coming week? Best, Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

martin.kurtovich@cpuc.ca.gov[martin.kurtovich@cpuc.ca.gov]

To:

#### U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: gasstar-admin@domain.invalid [mailto:gasstar-admin@domain.invalid]

Sent: Friday, September 18, 2015 1:11 PM

To: younus.burhan@tetratech.com

Cc: Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Methane Challenge Comments Submitted

The following comments were submitted to the Natural Gas STAR Methane Challenge website.

Record ID: 11

Timestamp: 09/18/15 12:10 PM

Name:

Martin Kurtovich

Email:

martin.kurtovich@cpuc.ca.gov

Organization:

California Public Utilities Commission

City:

San Francisco

State:

CA

#### **Comments:**

In 2014, the California State legislature passed Senate Bill 1371 which tasks the California Public Utilities Commission with the development of a program to address fugitive methane emissions from California's natural gas transmission and distribution systems. This will entail developing a leak detection and repair program as well as new monitoring and reporting requirements. These efforts seem very similar to the Methane Challenge. Would EPA be interested in partnering with the State of California to develop both programs concurrently?

#### **Attachment:**

None

View comments online at the Natural Gas STAR Methane Challenge feedback tool.

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Mon 11/23/2015 9:25:47 PM

Subject: RE: Methane Challenge Comments Submitted

Great, I figured that was an error – I will consider this version "the" ONE Future comments. Thanks!

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Tom Michels [mailto:tmichels@bwstrategies.com]

**Sent:** Monday, November 23, 2015 3:38 PM **To:** Bylin, Carey <Bylin.Carey@epa.gov>

# Subject: RE: Methane Challenge Comments Submitted

I am mortally embarrassed that my recall attempts didn't work, and therefore, that you were able to see my repeated attempts to send the proper version.

The only distinction between any of the files is that the "DRAFT" watermark wasn't removed on all of the pages. The attached file is the final copy which has the watermark removed. If you post this version, and not the version with "DRAFT" still on, I would be most grateful.

Tom Michels

Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Monday, November 23, 2015 3:27 PM

To: Tom Michels

Subject: FW: Methane Challenge Comments Submitted

Hi Tom,

Thanks very much for the comments on Methane Challenge. I got a few different submissions from you – can you please confirm which is the final document we should consider? Or did you intend to send multiples?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: gasstar-admin@domain.invalid [mailto:gasstar-admin@domain.invalid]

Sent: Friday, November 13, 2015 4:40 PM

To: younus.burhan@tetratech.com

Cc: Bylin, Carey < Bylin. Carey@epa.gov >

Subject: Methane Challenge Comments Submitted

The following comments were submitted to the Natural Gas STAR Methane Challenge website.

Record ID: 16

**Timestamp:** 11/13/15 03:40 PM

Name:

Tom Michels

tmichels@onefuture.us
Organization: Our Nation's Energy Future Coalition (ONE Future)
City:
Washington
State: DC
Comments:
Attachment:  ONE Future Coalition Comments on Methane Challenge Proposal-FINAL1.pdf

Email:

View comments online at the Natural Gas STAR Methane Challenge feedback tool.

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Mon 11/23/2015 8:27:03 PM

Subject: FW: Methane Challenge Comments Submitted

Hi Tom,

Thanks very much for the comments on Methane Challenge. I got a few different submissions from you – can you please confirm which is the final document we should consider? Or did you intend to send multiples?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: gasstar-admin@domain.invalid [mailto:gasstar-admin@domain.invalid]

Sent: Friday, November 13, 2015 4:40 PM

To: younus.burhan@tetratech.com

Cc: Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Methane Challenge Comments Submitted

The following comments were submitted to the Natural Gas STAR Methane Challenge website.

Record ID: 16

Timestamp: 11/13/15 03:40 PM

#### Name:

Tom Michels

#### Email:

tmichels@onefuture.us

# Organization:

Our Nation's Energy Future Coalition (ONE Future)

#### City:

Washington

### State:

DC

#### **Comments:**

#### **Attachment:**

ONE Future Coalition Comments on Methane Challenge Proposal-FINAL1.pdf

View comments online at the Natural Gas STAR Methane Challenge feedback tool.

**To:** Moerlins, Mary[Mary.Moerlins@nwnatural.com]

From: Bylin, Carey

**Sent:** Fri 11/20/2015 8:56:21 PM

Subject: RE: [External]RE: Methane Challenge- One Future Committment

Hi Mary,

Any luck with Tom? I wanted to follow up because ONE Future was present at our Annual Implementation Workshop this week and it was made clear that another contact is Fiji George of Southwestern Energy:

Tel: 832-796-2891

Mobile: Ex. 6 - Personal Privacy

Email: fiji.george@swn.com

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Moerlins, Mary [mailto:Mary.Moerlins@nwnatural.com]

**Sent:** Monday, November 16, 2015 11:17 AM **To:** Bylin, Carey <Bylin.Carey@epa.gov>

Subject: RE: [External]RE: Methane Challenge- One Future Committment

Thanks Carey,

I hope your time away from the office was lovely. I've had some trouble pinning down Tom Michels, but will keep trying this week.

Best

Mary

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Monday, November 16, 2015 6:40 AM

To: Moerlins, Mary

Subject: [External]RE: Methane Challenge- One Future Committment

Hello Mary,

Thank you very much for getting in touch and my apologies for the delay in replying (I was out of the office the end of last week). I would recommend that you contact Tom Michels, who is the lead contact for ONE Future. Please let me know if you have any other questions!

Principal, **BlueWater Strategies Ilc** 25 Massachusetts Avenue, NW Suite 820 Washington, DC 20001 tmichels@bwstrategies.com Direct - 202-589-1759 Office -202-589-0015Mobile -202-413-2059 Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Moerlins, Mary [mailto:Mary.Moerlins@nwnatural.com]

Sent: Wednesday, November 11, 2015 7:05 PM

**To:** Bylin, Carey < Bylin. Carey@epa.gov >

Subject: Methane Challenge- One Future Committment

Hi Carey,

I had a quick question, that certainly doesn't constitute a comment on the draft, but that would help me and my colleagues determine which challenge(s) make the most sense for us to adopt.

We find the concept of the One Future Commitment to be compelling, however I have not been able to get in touch with the Coalition to get a better understanding of what my sector (distribution) and company CI targets might be. Is there anywhere, beyond the One Future website, where I might be able to find more information? I'd like to dig in a bit more to better understand what we would be committing to. Any guidance would be appreciated.

Best wishes,

# Mary

#### **Mary Moerlins**

Community Affairs & Environmental Programs Manager

NW Natural

220 NW Second Avenue

Portland, Oregon 97209

**1** 503.226.4211 x5771

mary.moerlins@nwnatural.com

**To:** Moerlins, Mary[Mary.Moerlins@nwnatural.com]

From: Bylin, Carey

**Sent:** Mon 11/16/2015 2:39:59 PM

Subject: RE: Methane Challenge- One Future Committment

Hello Mary,

Thank you very much for getting in touch and my apologies for the delay in replying (I was out of the office the end of last week). I would recommend that you contact Tom Michels, who is the lead contact for ONE Future. Please let me know if you have any other questions!

Principal,

#### BlueWater Strategies Ilc

25 Massachusetts Avenue, NW

Suite 820

Washington, DC 20001

tmichels@bwstrategies.com

Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Moerlins, Mary [mailto:Mary.Moerlins@nwnatural.com]

Sent: Wednesday, November 11, 2015 7:05 PM

**To:** Bylin, Carey <Bylin.Carey@epa.gov>

Subject: Methane Challenge- One Future Committment

Hi Carey,

I had a quick question, that certainly doesn't constitute a comment on the draft, but that would help me and my colleagues determine which challenge(s) make the most sense for us to adopt.

We find the concept of the One Future Commitment to be compelling, however I have not been able to get in touch with the Coalition to get a better understanding of what my sector (distribution) and company CI targets might be. Is there anywhere, beyond the One Future website, where I might be able to find more information? I'd like to dig in a bit more to better understand what we would be committing to. Any guidance would be appreciated.

Best wishes,

# Mary

# **Mary Moerlins**

Community Affairs & Environmental Programs Manager

NW Natural

220 NW Second Avenue

Portland, Oregon 97209

**2**: 503.226.4211 x5771

mary.moerlins@nwnatural.com

To: Tom Michels[tmichels@bwstrategies.com]
Cc: Pryor, Justin[Pryor.Justin@epa.gov]

From: Bylin, Carey

**Sent:** Mon 11/9/2015 8:44:39 PM

**Subject:** Justin Pryor Contact

Hi Tom,

AS discussed, this week when I am gone you can also reach out to Justin Pryor if you want to discuss Methane Challenge: (202) 343-9258

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Thur 11/5/2015 1:56:51 PM

Subject: RE: ONE Future Document Review

Great, thank you. See you in a little bit.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Thursday, November 05, 2015 8:20 AM

**To:** Bylin, Carey <Bylin.Carey@epa.gov> **Subject:** Re: ONE Future Document Review

Here you go:

Dial In: Ex. 6 - Personal Privacy

Participant Passcode: Ex. 6 - Personal Privacy

# Tom Michels, Principal

tmichels@bwstrategies.com

Office - 202-589-0015

Direct - 202-589-1759

Mobile -202-413-2059

Sent from my mobile. Please pardon any typos.

On Nov 5, 2015, at 8:15 AM, Bylin, Carey < Bylin. Carey@epa.gov > wrote:

Okay, thanks, can you send the dial-in? I don't think anyone from EPA is calling in but I'd like to add it to the calendar invite just in case.

Carey Bylin

On Nov 4, 2015, at 5:18 PM, Tom Michels < tmichels@bwstrategies.com > wrote:

I'll come out in if that's cool with you. We can use our dial-in. Thank you very much!

Tom Michels, Principal tmichels@bwstrategies.com
Office - 202-589-0015

Direct - <u>202-589-1759</u> Mobile -202-413-2059

Sent from my mobile. Please pardon any typos.

On Nov 4, 2015, at 3:47 PM, Bylin, Carey < Bylin. Carey@epa.gov > wrote:

I actually had sent you the note yesterday afternoon from my phone and happened to see that it was still sitting in my outbox (darn cell service!).

We are fine with having a call-in – just let me know if we should use yours or if we should set one up. Happy to have you come in or call, as you prefer. We will all be gathered in one room at EPA if that's any incentive to come in.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

#### <image001.gif>

From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Wednesday, November 04, 2015 10:53 AM

**To:** Bylin, Carey < Bylin.Carey@epa.gov > **Subject:** RE: ONE Future Document Review

You must have sent this just as I shot you my note! Great minds...

Anyway, I'd prefer to come in, if only because I'm less easily distracted. But if you have no objections, I might just set up a call and open it up to whomever can make it from our Technical Committee. But again, I leave it to you to decide.

Tom Michels

Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, November 04, 2015 10:49 AM

To: Tom Michels

Subject: Re: ONE Future Document Review

Okay, great, thank you. We are confirmed on this side and it's fine for you to include whoever you need. Do you want to do a call or will you be coming in?

Carey Bylin

On Nov 2, 2015, at 4:47 PM, Tom Michels <a href="michels@bwstrategies.com">trategies.com</a> wrote:

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# Tom Michels, Principal

tmichels@bwstrategies.com

Office - 202-589-0015

Direct - 202-589-1759

Mobile -202-413-2059

Sent from my mobile. Please pardon any typos.

On Nov 2, 2015, at 4:32 PM, Bylin, Carey < Bylin. Carey@epa.gov > wrote:

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Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

#### <image001.gif>

From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Monday, November 02, 2015 11:58 AM To: Bylin, Carey < Bylin. Carey@epa.gov > Subject: RE: ONE Future Document Review

Hey Carey,

Just checking in to see if these times work for you – if not, say the word and I will adjust as appropriate.

Tom Michels

Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

From: Tom Michels

Sent: Friday, October 30, 2015 4:21 PM

To: 'Bylin, Carey'

Cc: Franklin, Pamela; Waltzer, Suzanne; Pryor, Justin

Subject: RE: ONE Future Document Review

Hi Carey,

Thanks so much to you and all for taking the time to review. Next week is fine. On

Wednesday, would you have availability sometime between 11 - 2pm? Alternatively on Thursday, would you have availability sometime between 10am - 1pm?

If neither time works, just let me know and we will figure it out. Also, is it alright if we have Fiji listening in on the phone? (If you're open to others, we could have the whole crew but it might make it easier to go over things in a small group first.)

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Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Friday, October 30, 2015 3:58 PM

To: Tom Michels

Cc: Franklin, Pamela; Waltzer, Suzanne; Pryor, Justin

Subject: ONE Future Document Review

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**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Thur 11/5/2015 1:15:32 PM

Subject: Re: ONE Future Document Review

Okay, thanks, can you send the dial-in? I don't think anyone from EPA is calling in but I'd like to add it to the calendar invite just in case.

Carey Bylin

On Nov 4, 2015, at 5:18 PM, Tom Michels < tmichels@bwstrategies.com > wrote:

I'll come out in if that's cool with you. We can use our dial-in. Thank you very much!

Tom Michels, Principal

tmichels@bwstrategies.com

Office - 202-589-0015

Direct - 202-589-1759

Mobile -202-413-2059

Sent from my mobile. Please pardon any typos.

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Wednesday, November 04, 2015 10:53 AM

**To:** Bylin, Carey < Bylin.Carey@epa.gov > **Subject:** RE: ONE Future Document Review

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Ms. Carey Bylin

International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address: Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460 <image001.gif> From: Tom Michels [mailto:tmichels@bwstrategies.com] Sent: Monday, November 02, 2015 11:58 AM

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From: Tom Michels

Sent: Friday, October 30, 2015 4:21 PM

To: 'Bylin, Carey'

Cc: Franklin, Pamela; Waltzer, Suzanne; Pryor, Justin

Subject: RE: ONE Future Document Review

Hi Carey,

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460				
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**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Wed 11/4/2015 8:47:21 PM

Subject: RE: ONE Future Document Review

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

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Mobile -202-413-2059

From: Tom Michels

**Sent:** Friday, October 30, 2015 4:21 PM

To: 'Bylin, Carey'

Cc: Franklin, Pamela; Waltzer, Suzanne; Pryor, Justin

Subject: RE: ONE Future Document Review

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**To:** Tom Michels[tmichels@bwstrategies.com]

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Mon 11/2/2015 9:32:47 PM

Subject: RE: ONE Future Document Review

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Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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U.S. Mail Address:



**To:** Tom Michels[tmichels@bwstrategies.com]

Cc: Pamela Franklin[Franklin.Pamela@epa.gov]; Suzanne Waltzer[Waltzer.Suzanne@epa.gov];

Pryor, Justin[Pryor.Justin@epa.gov]

From: Bylin, Carey

Sent: Fri 10/30/2015 7:57:34 PM Subject: ONE Future Document Review

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

### U.S. Mail Address:



**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

Sent: Wed 10/21/2015 1:47:56 PM
Subject: RE: Last minute meeting request

Okay, great, please come to the south entrance of WJC building (on your left as you come up from the Federal Triangle metro).

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Tom Michels [mailto:tmichels@bwstrategies.com]

To: Bylin, Carey; Gunning, Paul; Franklin, Pamela Subject: RE: Last minute meeting request That's perfect – thank you very much for accommodating us. Look forward to visiting with you! To which entrance should we report? Thanks much! Tom Michels Direct - 202-589-1759 Office -202-589-0015Mobile -202-413-2059 From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Tuesday, October 20, 2015 4:53 PM To: Tom Michels; Gunning, Paul; Franklin, Pamela Subject: RE: Last minute meeting request Hi Tom, Sure, we can meet from 2-3p tomorrow here at EPA. Does that work for you? Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program

Sent: Tuesday, October 20, 2015 4:58 PM

Global Methane Initiative

U.S. Environmental Protection Agency

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Tom Michels [mailto:tmichels@bwstrategies.com]

**Sent:** Tuesday, October 20, 2015 12:51 PM

To: Bylin, Carey; Gunning, Paul; Franklin, Pamela

Subject: RE: Last minute meeting request

We haven't had the chance to do a deep dive on this, but with Fiji in town I thought it might be beneficial to get together for an informal base-touching conversation to exchange preliminary ideas/thoughts on issues we think may arise from our end, and likewise from EPA to the extent you're able to share.

Some specifics that spring to mind:

- initial basic reactions on the supplemental doc,

- ideas on usage of direct measurements,
- capturing and tracking LDAR/DI&M contributions,
- expectations as to what may be clarified via the NSPS process.

We're not prepared for or expecting to give/recieve formal comments of any kind. Our telephone conversations have been enormously valuable, and we're not trying to subvert or evade any formal processes you have in place. Rather, with Fiji in town and your work now public, I just thought it could be useful to touch base in person. Thanks for considering!

Tom Michels

Direct - 202-589-1759

Office - 202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin,Carey@epa.gov]
Sent: Tuesday, October 20, 2015 12:34 PM
To: Tom Michels; Gunning, Paul; Franklin, Pamela

Subject: RE: Last minute meeting request

HI Tom,

Thank you for getting in touch. We can check availability for a meeting, but before doing so can I ask for a little more information on what you would like to discuss? That way we can see if we will have the right people available.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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From: Tom Michels [mailto:tmichels@bwstrategies.com]

**Sent:** Tuesday, October 20, 2015 11:27 AM

To: Gunning, Paul; Bylin, Carey; Franklin, Pamela

Subject: Last minute meeting request

Hi Paul, Pamela & Carey,

Congratulations on getting the draft supplemental Methane Challenge info out! I know you have all been working very hard to get this program up and running (among your numerous other projects) so I'm sure it's some relief to get it out the door.

It just so happens that Fiji George is in town tomorrow, and <u>I wanted to know if one or more of you might have time to sit down with us for an informal discussion sometime between 11:30am – 4:00pm tomorrow October 21<sup>st</sup>? (Fiji would need to depart for the airport at 4pm.) I realize this is last minute, but we would be very grateful for any time you can spare.</u>

If none of you can make it, we understand. But if you have some time, I think a quick face-to-face meeting to touch base would be worthwhile.

Thanks for considering – hope you're all well!

Tom Michels

Executive Director.

#### **ONE Future Coalition**

www.onefuture.us

Principal,

#### BlueWater Strategies Ilc

25 Massachusetts Avenue, NW

Suite 820

Washington, DC 20001

tmichels@bwstrategies.com

Direct - 202-589-1759

Office -202-589-0015

Mobile -202-413-2059

To: Howard Feldman[Feldman@api.org]

From: Bylin, Carey

**Sent:** Fri 10/16/2015 6:08:26 PM

Subject: RE: EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR Methane

Challenge Program

HI Howard,

Thanks for checking in. I just called and left you a voicemail on this.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Howard Feldman [mailto:Feldman@api.org]

Sent: Friday, October 16, 2015 11:18 AM

To: Bylin, Carey

Subject: FW: EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR

Methane Challenge Program

Carey,

Sorry to be a pest (more than usual) but we are wondering whether there is any timing on the updated materials and the revised comment deadlines?

Howard

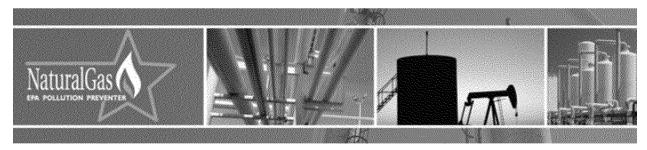
From: EPA Natural Gas STAR Program [mailto:gasstar@tetratech.com]

**Sent:** Friday, October 09, 2015 11:27 AM

To: Howard Feldman

Subject: EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR Methane

Challenge Program



# EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR Methane Challenge Program

EPA plans to shortly release a supplemental technical document that provides additional

information for stakeholders to evaluate and provide feedback on the proposed Natural Gas STAR Methane Challenge Program.

To allow sufficient time for stakeholders to review and provide feedback on the proposed Program, including supplemental documents, EPA plans to extend the deadline for feedback on all documents. The exact date of the new deadline will be announced shortly. Comments received through the Methane Challenge feedback mechanism will be made available publicly.

EPA greatly appreciates your feedback on all elements of the proposed Methane Challenge Program. EPA will carefully consider and evaluate all stakeholder feedback with the goal to finalize the Methane Challenge Program by the end of 2015. You can <u>submit feedback online</u> or by email to <u>methanechallenge@tetratech.com</u>. If you have questions about the program or wish to schedule a meeting, please contact Carey Bylin at (202) 343-9669 or by email at <u>bylin.carey@epa.gov</u>.



Bylin, Carey From:

**Location:** webmeeting Importance: Normal

**Subject:** Accepted: FW: ONE Future Weekly Technical Meeting **Start Date/Time:** Thur 10/15/2015 7:00:00 PM

Thur 10/15/2015 8:15:00 PM End Date/Time:

**To:** Humphrey, Charles[CHumphrey@semprautilities.com] **Cc:** Johnson, Darrell[DJohnson@semprautilities.com]

From: Bylin, Carey

**Sent:** Tue 10/13/2015 1:34:07 PM

Subject: RE: Mailing Address re Methane Challenge Comments

Okay, great. We are \*hoping\* to be able to release some additional supplemental material and name the new deadline date later this week.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Humphrey, Charles [mailto:CHumphrey@semprautilities.com]

Sent: Tuesday, October 13, 2015 9:29 AM

**To:** Bylin, Carey **Cc:** Johnson, Darrell

Subject: RE: Mailing Address re Methane Challenge Comments

Thanks so much Carey for getting back to me Carey. I did see a note on a proposed extension from Brian Jones of DSI, but not directly from EPA, so I didn't want to be too presumptuous. We will await the formal communication from EPA prior to sending comments.

Have a fantastic day!

#### **Charles Humphrey**

Project Mgr II – GHG Programs

SoCalGas Environmental Programs

W: 213.244.5476 M: 213.248.7547

email: chumphrey@semprautilities.com

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]
Sent: Tuesday, October 13, 2015 6:23 AM

To: Humphrey, Charles

Subject: RE: Mailing Address re Methane Challenge Comments

Hello Charles,

Thank you very much for getting in touch and for your plans to submit comments. My mailing address is specified in the last line of my signature line. Of note, we sent an e-mail Friday indicating that we are planning to extend the deadline, per the pending release of additional

supplemental technical information for the Program. Did you see that? We plan to communicate the exact extension date sometime this week.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Humphrey, Charles [mailto:CHumphrey@semprautilities.com]

Sent: Monday, October 12, 2015 7:08 PM

To: Bylin, Carey

Subject: Mailing Address re Methane Challenge Comments

Hello Carey,

SoCalGas and SDGE plan to send you comments on the proposed Methane Challenge by COB on Tuesday 10/13/15. I suppose it is permissible to send directly to you via email as well as via the TetraTech feedback page. However, I did want to send a copy via US Mail. I was not sure what your specific mailing address was. Can you provide the EPA mailing address please?

Thank you very much!

#### **Charles Humphrey**

Project Mgr II – GHG Programs

SoCalGas Environmental Programs

W: 213.244.5476 M: 213.248.7547

email: chumphrey@semprautilities.com

This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

To: Humphrey, Charles[CHumphrey@semprautilities.com]

From: Bylin, Carey

**Sent:** Tue 10/13/2015 1:31:58 PM

Subject: FW: EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR Methane

Challenge Program

Hello Charles,

Here is the note that was sent out about the extension.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



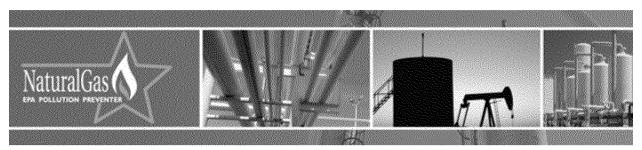
From: EPA Natural Gas STAR Program [mailto:gasstar@tetratech.com]

**Sent:** Friday, October 09, 2015 11:27 AM

To: Bylin, Carey

Subject: EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR

Methane Challenge Program



## EPA is Extending the Deadline to Provide Feedback on the Natural Gas STAR Methane Challenge Program

EPA plans to shortly release a supplemental technical document that provides additional information for stakeholders to evaluate and provide feedback on the proposed Natural Gas STAR Methane Challenge Program.

To allow sufficient time for stakeholders to review and provide feedback on the proposed Program, including supplemental documents, EPA plans to extend the deadline for feedback on all documents. The exact date of the new deadline will be announced shortly. Comments received through the Methane Challenge feedback mechanism will be made available publicly.

EPA greatly appreciates your feedback on all elements of the proposed Methane Challenge Program. EPA will carefully consider and evaluate all stakeholder feedback with the goal to finalize the Methane Challenge Program by the end of 2015. You can <u>submit feedback online</u> or by email to <u>methanechallenge@tetratech.com</u>. If you have questions about the program or wish to schedule a meeting, please contact Carey Bylin at (202) 343-9669 or by email at <u>bylin.carey@epa.gov</u>.

To: Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Tue 10/13/2015 1:24:03 PM

**Subject:** RE: Any thoughts on when details will be released?

Hi Pam,

Thanks for following up. I can't promise anything, but we are very much hoping to release it this week. I assume you saw the notice Friday on the extension for comments?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Monday, October 12, 2015 5:41 PM

To: Bylin, Carey

Subject: Any thoughts on when details will be released?

Hi Carey - Do you think the Methane Challenge Tech Support doc will be released this week ?- Thanks! -Pam

Sent from my Verizon Wireless 4G LTE Smartphone

To: Humphrey, Charles[CHumphrey@semprautilities.com]

From: Bylin, Carey

**Sent:** Tue 10/13/2015 1:22:54 PM

Subject: RE: Mailing Address re Methane Challenge Comments

Hello Charles,

Thank you very much for getting in touch and for your plans to submit comments. My mailing address is specified in the last line of my signature line. Of note, we sent an e-mail Friday indicating that we are planning to extend the deadline, per the pending release of additional supplemental technical information for the Program. Did you see that? We plan to communicate the exact extension date sometime this week.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Humphrey, Charles [mailto:CHumphrey@semprautilities.com]

Sent: Monday, October 12, 2015 7:08 PM

To: Bylin, Carey

Subject: Mailing Address re Methane Challenge Comments

Hello Carey,

SoCalGas and SDGE plan to send you comments on the proposed Methane Challenge by COB on Tuesday 10/13/15. I suppose it is permissible to send directly to you via email as well as via the TetraTech feedback page. However, I did want to send a copy via US Mail. I was not sure what your specific mailing address was. Can you provide the EPA mailing address please?

Thank you very much!

## **Charles Humphrey**

Project Mgr II – GHG Programs

SoCalGas Environmental Programs

W: 213.244.5476 M: 213.248.7547

email: chumphrey@semprautilities.com

To: Brian Jones[bjones@mjbradley.com]
Cc: Pamela Franklin[Franklin.Pamela@epa.gov]

From: Bylin, Carey

**Sent:** Mon 10/5/2015 8:21:02 PM

Subject: RE: Draft CH4 Connections Presentation

Great, thanks, Brian. No update on feedback deadline – we still intend to extend but don't have any details to share at the moment.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Brian Jones [mailto:bjones@mjbradley.com]

Sent: Monday, October 05, 2015 4:01 PM

To: Bylin, Carey

Subject: RE: Draft CH4 Connections Presentation

Thanks Carey. Attached is the final version that I sent along to GTI for the conference tomorrow. You can share this with your colleague.

Any update on Methane Challenge timing? I am down in Houston already...

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

**Sent:** Thursday, October 01, 2015 9:47 AM **To:** Brian Jones <br/>
<u>bjones@mjbradley.com</u>>

Subject: RE: Draft CH4 Connections Presentation

Brian,

This looks great. I appreciate your sharing it with me and also the positive presentation of Methane Challenge. I don't have any comments.

Do I have your permission to share this with my colleague who does our Inventory (so she can see your slide on potential updates)? It will not go beyond her.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Brian Jones [mailto:bjones@mjbradley.com]
Sent: Wednesday, September 30, 2015 4:26 PM

To: Bylin, Carey

Subject: Draft CH4 Connections Presentation

Hi Carey

As discussed, attached is my draft presentation for the CH4 Connections conference next week in Houston. Please let me know if you have any thoughts or comments – I need to send it along to the conference organizers tomorrow.

**Thanks** 

Brian

\*\*\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

M.J. Bradley & Associates, LLC.

47 Junction Square Drive

Concord, MA 01742

Direct: (978) 405-1269

Mobile: Ex. 6 - Personal Privacy

Fax: (978) 369-7712

Email: bjones@mjbradley.com

Web: www.mjbradley.com

\*\*\*\*\*\*\*

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To: Brian Jones[bjones@mjbradley.com]

From: Bylin, Carey

**Sent:** Thur 10/1/2015 1:46:34 PM

Subject: RE: Draft CH4 Connections Presentation

Brian,

This looks great. I appreciate your sharing it with me and also the positive presentation of Methane Challenge. I don't have any comments.

Do I have your permission to share this with my colleague who does our Inventory (so she can see your slide on potential updates)? It will not go beyond her.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



**From:** Brian Jones [mailto:bjones@mjbradley.com] **Sent:** Wednesday, September 30, 2015 4:26 PM

To: Bylin, Carey

Subject: Draft CH4 Connections Presentation

Hi Carey

As discussed, attached is my draft presentation for the CH4 Connections conference next week in Houston. Please let me know if you have any thoughts or comments – I need to send it along to the conference organizers tomorrow.

Thanks

Brian

\*\*\*\*\*\*\*

Brian M. Jones

Senior Vice President, Strategy and Policy

M.J. Bradley & Associates, LLC.

47 Junction Square Drive

Concord, MA 01742

Direct: (978) 405-1269

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\*\*\*\*\*\*\*\*

This transmission may contain information that is confidential or legally privileged and is intended solely for the addressee. If you are not the intended recipient, please do not use the information in this e-mail, including any attachment(s) in any way, delete this e-mail, and immediately contact the sender. Thank you for your cooperation.

To: Ann W Loomis (Services - 6)[ann.w.loomis@dom.com]

From: Bylin, Carey

**Sent:** Thur 9/24/2015 12:44:56 AM

Subject: RE: Meeting request from Dominion

Hi Ann,

The 7<sup>th</sup> works. How about 3p? Just to confirm, does this mostly cover Methane Challenge, or do you anticipate that we should include our GHGRP representatives?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



Sent: Wednesday, September 23, 2015 9:56 AM
To: Bylin, Carey
Subject: RE: Meeting request from Dominion

Carey,

Thanks for your reply. It would be a staff-level meeting and we would like to suggest the 7th if possible. I will provide you with the names attending from Dominion. It would be a few people from our environmental division and gas transmission operations.

Thank you,

Ann

Ann Loomis|Senior Advisor, Federal & Environmental Policy|Dominion

400 N. Capitol Street, NW, Suite 875, Washington, DC 20001

202.585.4205

From: Ann W Loomis (Services - 6) [mailto:ann.w.loomis@dom.com]

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, September 23, 2015 8:46 AM

To: Ann W Loomis (Services - 6)

Subject: RE: Meeting request from Dominion

Hi Ann,

Thanks very much for getting in touch on this. We would of course be happy to set up a meeting to discuss your questions/feedback on the Methane Challenge proposal. The week of October 5 is pretty open right now (hopefully the government will be open!), and Monday or Wednesday would be best days. I assume this will be a staff-level meeting?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



To: Bylin, Carey Subject: Meeting request from Dominion Carey, I have joined a few of the meetings you and your team have held in INGAA and other companies on the Methane Challenge program. At the last meeting there was an extensive discussion of INGAA's DI&M program as a best management practice and some shortcomings that could be added to the program to improve accountability. Dominion has a few issues concerning the Methane Challenge proposal that extend beyond the DI&M program. We like an opportunity to meet with you and your team to discuss these issues any provide any additional information that you may need. We could be available the week of October 5 if you have any time available. Thank you for considering this request. We will be available at your convenience. Ann Ann Loomis|Senior Advisor, Federal & Environmental Policy|Dominion 400 N. Capitol Street, NW, Suite 875, Washington, DC 20001 202.585.4205

From: Ann W Loomis (Services - 6) [mailto:ann.w.loomis@dom.com]

Sent: Wednesday, September 16, 2015 5:38 PM

To: Lacey, Pam[PLacey@aga.org]

From: Bylin, Carey

**Sent:** Thur 9/24/2015 12:40:17 AM

Subject: RE: Methane Challenge - any word yet on BMP details and draft MOU text?

HI Pam,

I'm so sorry but, as you know, the document is not out yet and I don't have a date at this point. If it would be helpful to discuss our plans, I'm happy to do that.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, September 23, 2015 11:24 AM

To: Bylin, Carey

Subject: Methane Challenge - any word yet on BMP details and draft MOU text?

Hi Carey – AGA is holding its Fall Committee Meetings next week, and I would like to have the BMP details for distribution, transmission and storage if possible so we could discuss them at the environmental committee meeting on Monday or Tuesday. Is that possible? Thanks! - Pam

# Pamela A. Lacey | Senior Managing Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe delivery of clean natural gas to over 68 million customers throughout the nation.

To: Theresa Pugh[tpugh@ingaa.org]

From: Bylin, Carey

**Sent:** Thur 9/24/2015 12:32:46 AM

Subject: RE: Checking in on Methane Challenge

Hi Theresa,

Thanks so much for following up. As you know, the draft documents (a document with additional technical information, an MOU template, and an implementation plan template) are not out and I don't have a due date for release. However, please be assured we are actively watching the clock and are planning (though I can't guarantee this until it's done) to extend the deadline if there is not a reasonable amount of time before the October 13 deadline.

I'm sorry I can't be more specific, but I hope this information helps.

Ms. Carey Bylin
International Programs Leader, Oil and Gas
Natural Gas STAR Program
Global Methane Initiative
U.S. Environmental Protection Agency
Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)
1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

----Original Message----

From: Theresa Pugh [mailto:tpugh@ingaa.org] Sent: Wednesday, September 23, 2015 2:53 PM

To: Bylin, Carey

Subject: Checking in on Methane Challenge

#### Hi Carev

I know we spoke on Sept 11. I was wondering about the estimated time of announcement of the Methane Challenge documents (2?3?) dealing with technical issues or model template for the MOU.

We are getting a bit anxious because getting 25 different companies to form opinions and approve comments takes 2 weeks at minimum- if all the issues are already known. If these documents (whether 2 or 3) are in the slightest complicated we will need more than 3 weeks to prepare and be ready to submit comments on Methane Challenge.

I have a member call tomorrow afternoon (Thurs). It would be great if I could give them any sense of the timing of your announcement and also whether the deadline of Oct 13 for comments will be extended since those are coming out so late--Next week is the end of Sept.

On a personal level I'd also be grateful to know. I am having a hard time scheduling a one week vacation without knowing what my Oct and Nov will look like. We are also working on OOOOa and aggregation and CTGs too of course.

Thank you. If you want- feel free to call me at [Ex. 6-Personal Privacy]. I am working from home today and tomorrow due to Pope's visit. I will be back at the office on Fri.

Many thanks- hope you are enjoying the great weather. Theresa

Sent from mobile device, please excuse typos.

To: Ann W Loomis (Services - 6)[ann.w.loomis@dom.com]

From: Bylin, Carey

**Sent:** Wed 9/23/2015 12:45:38 PM

**Subject:** RE: Meeting request from Dominion

Hi Ann,

Thanks very much for getting in touch on this. We would of course be happy to set up a meeting to discuss your questions/feedback on the Methane Challenge proposal. The week of October 5 is pretty open right now (hopefully the government will be open!), and Monday or Wednesday would be best days. I assume this will be a staff-level meeting?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Ann W Loomis (Services - 6) [mailto:ann.w.loomis@dom.com]

Sent: Wednesday, September 16, 2015 5:38 PM

To: Bylin, Carey

Subject: Meeting request from Dominion

Carey,

I have joined a few of the meetings you and your team have held in INGAA and other companies on the Methane Challenge program. At the last meeting there was an extensive discussion of INGAA's DI&M program as a best management practice and some shortcomings that could be added to the program to improve accountability. Dominion has a few issues concerning the Methane Challenge proposal that extend beyond the DI&M program. We like an opportunity to meet with you and your team to discuss these issues any provide any additional information that you may need.

We could be available the week of October 5 if you have any time available.

Thank you for considering this request. We will be available at your convenience.

Ann

Ann Loomis|Senior Advisor, Federal & Environmental Policy|Dominion

400 N. Capitol Street, NW, Suite 875, Washington, DC 20001

202.585.4205

**To:** Jeremy Kamo[jeremy.kamo@furtherbydesign.com]

From: Bylin, Carey

**Sent:** Wed 9/23/2015 12:39:37 PM

Subject: RE: UNEP/CCAC - Flaring reduction project & innovation platform

Hi Jeremy,

Thank you for getting in touch on this. I'd be happy to discuss, but it will have to be in the later part of next week. Would that work for you?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Jeremy Kamo [mailto:jeremy.kamo@furtherbydesign.com] Sent: Thursday, September 17, 2015 2:33 AM To: Bylin, Carey Subject: UNEP/CCAC - Flaring reduction project & innovation platform
Hi Carey,
I understand you run the EPA's Natural Gas STAR program and the Methane Challenge.
I've been working with UNDP/Climate and Clean Air Coalition (CCAC) and PEMEX on a project to reduce black carbon associated with flaring and venting. Its been going really well, across the PEMEX facility we're hoping to be able to:
<ul> <li>mitigate 8.2 megatons of carbon annually</li> <li>generate \$83.7m in annual revenues</li> </ul>
As we look at the challenges the project has revealed, we've also begun exploring whether an innovation program focused on technology, financial and policy innovations for reducing flaring and venting would be appropriate for the industry and have begun talking to a few service providers, research organizations, oil & gas companies, funders and policy makers.
Given the work you're doing with oil & gas companies around voluntary commitments, I was wondering if we could discuss your current approach and see where the two projects might come together.
What does your schedule look like next week? Would a call Wednesday 4pm ET (1pm PT) work for you?
Best,

Jeremy

--

Jeremy Kamo

connector

# FURTHER by Design...

| mobile: 1 808 780 8637

email: jeremy.kamo@furtherbydesign.com

skype: jeremy.kamo

web: www.furtherbydesign.com

DISCLAIMER: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately and delete the email.

From: Bylin, Carey Tue 9/22/2015 8:21:58 PM Sent: Subject: RE: Deadline Extended for Feedback on the Natural Gas STAR Methane Challenge Proposal Hello Chris, Thank you for your interest in this program and for getting in touch. We have not yet released the referenced supplemental documents, but endeavor to do so as soon as possible. When the documents are available, we will send out an e-mail notification to that effect. Best. Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

chris.kapp@hoerbiger.com[chris.kapp@hoerbiger.com]

To:



**From:** chris.kapp@hoerbiger.com [mailto:chris.kapp@hoerbiger.com]

Sent: Sunday, September 20, 2015 10:08 PM

To: Bylin, Carey

Subject: Deadline Extended for Feedback on the Natural Gas STAR Methane Challenge

Proposal

### Hi Carey

As an interested party HOERBIGER would like to comment on the documents below before your deadline October 13:

Draft Memorandum of Understanding (MOU)
Draft Implementation Plan Template
Draft Technical Specifications for BMP Commitment Options

I checked out the EPA methane challenge web site and the links for the documents are not active. Could you either send me the documents by email or check the links and activate them please?

### Thank-you!

Regards/mfg, Chris Kapp, Sr. VP Global Head Compression Technology Systems HOERBIGER KT

HOERBIGER

1212 Milby Street
Houston, Texas - 77023
Cell (281) 569-9696
info-americas@hoerbiger.com
www.hoerbiger.com

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Mon 9/21/2015 1:37:15 PM

Subject: RE: Chat in the morning about Methane Challenge?

Hi Tom,

Yes, I'll call you at 11:30a. I'll be coming from another meeting so I may be a few minutes late.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:



From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Monday, September 21, 2015 9:00 AM

To: Bylin, Carey

Subject: Re: Chat in the morning about Methane Challenge?

No problem - How about 11:30?

# Tom Michels, Principal

tmichels@bwstrategies.com

Office - 202-589-0015

Direct - 202-589-1759

Mobile -202-413-2059

Sent from my mobile. Please pardon any typos.

On Sep 21, 2015, at 8:45 AM, Bylin, Carey <Bylin.Carey@epa.gov> wrote:

Hi Tom, so sorry for the delay. Unfortunately I've had a meeting come up for that time. I'm open between 11:30 and 1:30 or at 3:30. Also, I have some updates from our call Thursday. Do you have any time this morning to chat?

Carey Bylin

On Sep 17, 2015, at 12:16 PM, Tom Michels < tmichels@bwstrategies.com > wrote:

Hi Carey,

Thanks for this – could I come by to visit with you around 3:00pm on Monday?

Tom Michels

Direct - 202-589-1759

Office -202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Thursday, September 17, 2015 9:10 AM To: Tom Michels Subject: RE: Chat in the morning about Methane Challenge? Hi Tom, Good to talk this morning. For next week, I'm open Monday all day except 1-2:30p and Tuesday I have meetings at 10a and 3p but otherwise am free – note that on Tuesday I work from home. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

#### <image001.gif>

From: Tom Michels [mailto:tmichels@bwstrategies.com]

Sent: Wednesday, September 16, 2015 5:11 PM

To: Bylin, Carey

**Subject:** RE: Chat in the morning about Methane Challenge?

Yes please! Just ring my cell. Thank Carey!

Tom Michels

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Office -202-589-0015

Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, September 16, 2015 5:07 PM

To: Tom Michels

Subject: Re: Chat in the morning about Methane Challenge?

Great, shall I call you at 830?

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And I am not a morning person...

Tom Michels

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Mobile -202-413-2059

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]
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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Mon 9/21/2015 12:45:11 PM

Subject: Re: Chat in the morning about Methane Challenge?

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Thur 9/17/2015 1:10:26 PM

Subject: RE: Chat in the morning about Methane Challenge?

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Wed 9/16/2015 9:06:38 PM

Subject: Re: Chat in the morning about Methane Challenge?

Great, shall I call you at 830?

Carey Bylin

On Sep 16, 2015, at 5:00 PM, Tom Michels < tmichels@bwstrategies.com > wrote:

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Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

**To:** Tom Michels[tmichels@bwstrategies.com]

From: Bylin, Carey

**Sent:** Wed 9/16/2015 8:27:33 PM

Subject: Chat in the morning about Methane Challenge?

Hi Tom,

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

To: Lacey, Pam[PLacey@aga.org]

Cc: Franklin, Pamela[Franklin.Pamela@epa.gov]; Waltzer, Suzanne[Waltzer.Suzanne@epa.gov]

From: Bylin, Carey

**Sent:** Wed 9/9/2015 8:06:58 PM

Subject: RE: EPA-AGA Meeting on Methane Challenge - my conf call number or EPA's?

Great, Pam, I'm looking forward to it. Thank you!

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Lacey, Pam [mailto:PLacey@aga.org]

Sent: Wednesday, September 09, 2015 2:16 PM  To: Bylin, Carey  Cc: Franklin, Pamela; Waltzer, Suzanne
Subject: RE: EPA-AGA Meeting on Methane Challenge - my conf call number or EPA's?
Yes, all on the phone. And let's use your conference call number. Thank you! - Pam
From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]  Sent: Wednesday, September 09, 2015 2:11 PM  To: Lacey, Pam < PLacey@aga.org> Cc: Franklin, Pamela < Franklin.Pamela@epa.gov>; Waltzer, Suzanne < Waltzer.Suzanne@epa.gov> Subject: RE: EPA-AGA Meeting on Methane Challenge - my conf call number or EPA's?
Hi Pam,
Sorry for the delay. I'm neutral on whose conference line. We can use the one below unless you have a preference to use yours? Also, I'm assuming this will be all on the phone – is that the case or was anyone planning to meet in person?
Toll-free dial-in number (U.S. and Canada): Ex. 6 - Personal Privacy
International dial-in number: Ex. 6 - Personal Privacy
Conference code: Ex. 6 - Personal Privacy
Ms. Carey Bylin

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, September 02, 2015 11:28 AM

To: Bylin, Carey

Cc: Franklin, Pamela; Waltzer, Suzanne

Subject: RE: EPA-AGA Meeting on Methane Challenge - my conf call number or EPA's?

Carey – Do you want to provide a conference call-in number? Or shall I? - Pam

Pamela A. Lacey | Senior Managing Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

The American Gas Association represents more than 200 local energy companies committed to the safe delivery of clean natural gas to over 68 million customers throughout the nation.

From: Lacey, Pam

Sent: Wednesday, September 02, 2015 11:09 AM

To: 'Bylin, Carey' < Bylin. Carey@epa.gov>

Cc: Franklin, Pamela <Franklin.Pamela@epa.gov>; Waltzer, Suzanne

< Waltzer. Suzanne@epa.gov>

Subject: RE: EPA-AGA Meeting on Methane Challenge

Hi Carey – Yes, 2-4 pm Friday Sept. 11. Thanks! - Pam

# Pamela A. Lacey | Senior Managing Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | M: 202-809-6565 | F: 202-824-9190 | placey@aga.org

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From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]
Sent: Wednesday, September 02, 2015 10:42 AM

To: Lacey, Pam < PLacey@aga.org>

Cc: Franklin, Pamela <Franklin.Pamela@epa.gov>; Waltzer, Suzanne

< Waltzer. Suzanne@epa.gov>

Subject: RE: EPA-AGA Meeting on Methane Challenge

Hi Pam.

Thanks for the quick response. 2p on Friday the 11th would be great. Shall we plan for 2 hours?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, September 02, 2015 10:37 AM

To: Bylin, Carey

Cc: Franklin, Pamela; Waltzer, Suzanne

Subject: RE: EPA-AGA Meeting on Methane Challenge

Carey – The votes are in. Friday Sept. 11<sup>th</sup> in the afternoon works for nearly everyone. The other days are not so good, in part because some of the operations technical people are tied up with a PHMSA workshop on Wednesday and Thursday next week.

Shall we say 2 pm on Friday Sept. 11? How long should we plan for? Thanks for being flexible. - Pam

# Pamela A. Lacey | Senior Managing Counsel, Environment

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From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, September 01, 2015 5:01 PM

To: Lacey, Pam < PLacey@aga.org>

Cc: Franklin, Pamela < Franklin. Pamela@epa.gov >; Waltzer, Suzanne

<Waltzer.Suzanne@epa.gov>

Subject: Re: EPA-AGA Meeting on Methane Challenge

Hi Pam,

Thank you for getting back to me. If next Wednesday doesn't work, we could also do Thursday or Friday. If none of those work then we can plan to move to the following week. Yes, we will provide a call-in line.

We don't have a specific date for when the technical documents will be released, but we are endeavoring to get them out as soon as possible to leave enough time for review prior to the feedback deadline of October 13.

Carey Bylin

On Sep 1, 2015, at 1:33 PM, Lacey, Pam < PLacey@aga.org > wrote:

Carey – I would like to include some members, and it may be difficult to get their attention this quickly – especially around the holiday weekend. Can you have a call in number? And if next Wednesday doesn't work out, how about Tuesday Sept. 15 or Wed. Sept. 16?

Also, when do you expect to release the draft technical information for the BMP option? Thanks! and enjoy your Labor Day weekend! - Pam

# Pamela A. Lacey | Senior Managing Counsel, Environment

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From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, September 01, 2015 1:13 PM

**To:** Lacey, Pam < PLacey@aga.org>

Cc: Franklin, Pamela < Franklin. Pamela@epa.gov >; Waltzer, Suzanne

<Waltzer.Suzanne@epa.gov>

Subject: EPA-AGA Meeting on Methane Challenge

Hi Pam,

I hope you are doing well. I wanted to get in touch about possibly setting up a meeting to

discuss technical details of the Methane Challenge proposal for the distribution segment. As we recently announced, we will be putting out draft technical information in support of the BMP commitment option, and it would be great to talk to AGA and your members about this effort. Perhaps next Wednesday would work for you? Please let me know of your interest and availability and we can set up a call. Thank you. Best, Carey Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669 Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

# U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

From:

Bylin, Carey
Ex. 6 - Personal Privacy Location:

Importance: Normal

**Subject:** Accepted: DSI-EPA Call - Methane Challenge Program **Start Date/Time:** Fri 9/11/2015 2:00:00 PM

Fri 9/11/2015 4:00:00 PM End Date/Time:

To: Lacey, Pam[PLacey@aga.org]

Cc: Franklin, Pamela[Franklin.Pamela@epa.gov]; Waltzer, Suzanne[Waltzer.Suzanne@epa.gov]

From: Bylin, Carey

**Sent:** Wed 9/9/2015 6:10:53 PM

Subject: RE: EPA-AGA Meeting on Methane Challenge - my conf call number or EPA's?

Hi Pam,

Sorry for the delay. I'm neutral on whose conference line. We can use the one below unless you have a preference to use yours? Also, I'm assuming this will be all on the phone – is that the case or was anyone planning to meet in person?

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Subject	t RE	FPA-	AGA	Meeting	on Ma	ethane	Challenge
Subjec	u KL.	$_{\rm L1}$ $_{\rm \Lambda}$ -	лОЛ	MICCHIE	OH IVE	Curanc	Chancinge

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From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, September 02, 2015 10:42 AM

To: Lacey, Pam < PLacey@aga.org>

Cc: Franklin, Pamela < Franklin.Pamela@epa.gov >; Waltzer, Suzanne

< Waltzer.Suzanne@epa.gov>

Subject: RE: EPA-AGA Meeting on Methane Challenge

Hi Pam,

Thanks for the quick response. 2p on Friday the 11th would be great. Shall we plan for 2 hours?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Lacey, Pam [mailto:PLacey@aga.org]
Sent: Wednesday, September 02, 2015 10:37 AM

To: Bylin, Carey

Cc: Franklin, Pamela; Waltzer, Suzanne

Subject: RE: EPA-AGA Meeting on Methane Challenge

Carey – The votes are in. Friday Sept. 11<sup>th</sup> in the afternoon works for nearly everyone. The other days are not so good, in part because some of the operations technical people are tied up with a PHMSA workshop on Wednesday and Thursday next week.

Shall we say 2 pm on Friday Sept. 11? How long should we plan for? Thanks for being flexible. - Pam

# Pamela A. Lacey | Senior Managing Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

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From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Tuesday, September 01, 2015 5:01 PM

**To:** Lacey, Pam < <u>PLacey@aga.org</u>>

Cc: Franklin, Pamela < Franklin. Pamela@epa.gov >; Waltzer, Suzanne

< Waltzer.Suzanne@epa.gov>

Subject: Re: EPA-AGA Meeting on Methane Challenge

Hi Pam,

Thank you for getting back to me. If next Wednesday doesn't work, we could also do Thursday or Friday. If none of those work then we can plan to move to the following week. Yes, we will provide a call-in line.

We don't have a specific date for when the technical documents will be released, but we are endeavoring to get them out as soon as possible to leave enough time for review prior to the feedback deadline of October 13.

Carey Bylin

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Also, when do you expect to release the draft technical information for the BMP option? Thanks! and enjoy your Labor Day weekend! - Pam

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Cc: Franklin, Pamela <Franklin.Pamela@epa.gov>; Waltzer, Suzanne

<Waltzer.Suzanne@epa.gov>

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Thank you.

Best,
Carey
Ms. Carey Bylin
International Programs Leader, Oil and Gas
Natural Gas STAR Program
Global Methane Initiative
U.S. Environmental Protection Agency
Phone: +1-202-343-9669
Visiting Address & Private Deliveries (courier, FedEx etc.)  1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004
U.S. Mail Address:  Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460
<image001.gif></image001.gif>

From: Bylin, Carey

Location: I'll call your office line

Importance: Normal

Subject: Methane Challenge Feedback Follow-Up Start Date/Time: Wed 9/9/2015 5:30:00 PM Find Date/Time: Wed 9/9/2015 6:00:00 PM

Hi Brian,

I had some things come up that I have to do this morning - will this time tomorrow work for you to continue our discussion of the Methane Challenge feedback?

Carey

To: Cauchi,Mark [NCR][Mark.Cauchi@ec.gc.ca]

From: Bylin, Carey

**Sent:** Wed 9/9/2015 2:03:14 PM

Subject: RE: chat re: dates for Gas Star call

Hello Mark,

Thank you for getting in touch and apologies for the delay in replying. We are working to get our Methane Challenge technical details out in the public domain (in the coming weeks) and I think that this call could benefit from having those documents out and available. Can we plan for something later in September?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

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Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Cauchi, Mark [NCR] [mailto:Mark.Cauchi@ec.gc.ca]

Sent: Tuesday, September 08, 2015 10:48 AM

To: Bylin, Carey

Subject: chat re: dates for Gas Star call

Hi Carey, is there a good time for us to chat today by phone?

Mark Cauchi

Executive Director of the Oil, Gas and Alternative Energy Division /

Directeur exécutif, pétrole, gaz et énergie de remplacement

Environment Canada / Environnement Canada

From: Bylin, Carey

Location: I'll call your office line

Importance: Normal

Subject: Methane Challenge Feedback Follow-Up Start Date/Time: Wed 9/9/2015 3:30:00 PM End Date/Time: Wed 9/9/2015 4:00:00 PM

Hi Brian,

I had some things come up that I have to do this morning - will this time tomorrow work for you to continue our discussion of the Methane Challenge feedback?

Carey

From: Bylin, Carey

Location: I'll call your office line

Importance: Normal

Subject: Methane Challenge Feedback Follow-Up Start Date/Time: Tue 9/8/2015 2:30:00 PM End Date/Time: Tue 9/8/2015 3:00:00 PM

To: Lacey, Pam[PLacey@aga.org]

Cc: Franklin, Pamela[Franklin.Pamela@epa.gov]; Waltzer, Suzanne[Waltzer.Suzanne@epa.gov]

From: Bylin, Carey

**Sent:** Wed 9/2/2015 2:42:23 PM

Subject: RE: EPA-AGA Meeting on Methane Challenge

Hi Pam,

Thanks for the quick response. 2p on Friday the 11th would be great. Shall we plan for 2 hours?

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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Cc: Franklin, Pamela; Waltzer, Suzanne

Subject: RE: EPA-AGA Meeting on Methane Challenge

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Subject: Re: EPA-AGA Meeting on Methane Challenge

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Visiting Address & Private Deliveries (courier, FedEx etc.)

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

To: Lacey, Pam[PLacey@aga.org]

Cc: Franklin, Pamela[Franklin.Pamela@epa.gov]; Waltzer, Suzanne[Waltzer.Suzanne@epa.gov]

From: Bylin, Carey

**Sent:** Tue 9/1/2015 9:01:21 PM

Subject: Re: EPA-AGA Meeting on Methane Challenge

Hi Pam,

Thank you for getting back to me. If next Wednesday doesn't work, we could also do Thursday or Friday. If none of those work then we can plan to move to the following week. Yes, we will provide a call-in line.

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Sent: Tuesday, September 01, 2015 1:13 PM

To: Lacey, Pam < PLacey@aga.org> Cc: Franklin, Pamela < Franklin.Pamela@epa.gov>; Waltzer, Suzanne
<a href="mailto:&lt;a href=" mailto:subject"=""><u>Waltzer.Suzanne@epa.gov</u>&gt; <a href="mailto:Subject">Subject: EPA-AGA Meeting on Methane Challenge</a></a>
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## U.S. Environmental Protection Agency

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460

<image001.gif>

To: Cc: From: Sent: Subject:	Lacey, Pam[PLacey@aga.org] Pamela Franklin[Franklin.Pamela@epa.gov]; Suzanne Waltzer[Waltzer.Suzanne@epa.gov] Bylin, Carey Tue 9/1/2015 5:13:02 PM EPA-AGA Meeting on Methane Challenge	
Hi Pam,		
I hope you are doing well. I wanted to get in touch about possibly setting up a meeting to discuss technical details of the Methane Challenge proposal for the distribution segment. As we recently announced, we will be putting out draft technical information in support of the BMP commitment option, and it would be great to talk to AGA and your members about this effort.		
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Thank yo	u.	
Best,		
Carey		
Ms. Care	y Bylin	
International Programs Leader, Oil and Gas		
Natural C	Gas STAR Program	
Global Methane Initiative		
U.S. Env	ironmental Protection Agency	

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From:

Bylin, Carey
Ex. 6 - Personal Privacy Location:

Importance: Normal

**Subject:** Declined: DSI Call - Methane Challenge Program **Start Date/Time:** Tue 9/1/2015 6:00:00 PM

Tue 9/1/2015 7:00:00 PM End Date/Time:

From:

Bylin, Carey

Ex. 6 - Personal Privacy Location:

Importance: Normal

Subject: Accepted: DSI Call - Methane Challenge Program Start Date/Time: Tue 9/1/2015 6:00:00 PM

Tue 9/1/2015 7:00:00 PM End Date/Time:

To: Patney, Arjun[Arjun.Patney@winrock.org]

From: Bylin, Carey

**Sent:** Fri 8/28/2015 5:32:15 PM

Subject: RE: Request for call on Methane Challenge

Okay, great, thank you.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

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1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Patney, Arjun [mailto:Arjun.Patney@winrock.org]

Sent: Friday, August 28, 2015 1:11 PM

To: Bylin, Carey Subject: RE: Request for call on Methane Challenge Yes, that will work fine. I'll call you then. Regards, Arjun From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Friday, August 28, 2015 10:10 AM To: Patney, Arjun < Arjun. Patney@winrock.org > Subject: RE: Request for call on Methane Challenge Hello Arjun, So sorry about that. Thanks very much for following up. Would 3p Eastern time work for you? If so, do you want to call my office number below?

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

Global Methane Initiative

U.S. Environmental Protection Agency

Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.) 1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004 U.S. Mail Address: Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460 From: Patney, Arjun [mailto:Arjun.Patney@winrock.org] **Sent:** Friday, August 28, 2015 1:08 PM To: Bylin, Carey Subject: RE: Request for call on Methane Challenge Hello Carey, I didn't hear back from you on a time to speak today. My schedule is pretty open. Feel free to suggest. Regards, Arjun

Arjun Patney Policy Director

#### American Carbon Registry, an enterprise of Winrock International

office 916.520.8628 | cell 916.296.9032 | e-mail arjun.patney@winrock.org

800 J Street, Suite 539 | Sacramento, CA 95814 USA | www.winrock.org | www.americancarbonregistry.org

From: Patney, Arjun

**Sent:** Friday, August 21, 2015 8:22 AM **To:** 'Bylin, Carey' < Bylin.Carey@epa.gov>

Subject: RE: Request for call on Methane Challenge

Hi Carey,

That's alright. I am available anytime on the 28th. I'm also available today through the 27th if you have time earlier. Just let me know what time/date works.

Regards,

Arjun

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov]

Sent: Friday, August 21, 2015 10:06 AM

**To:** Patney, Arjun <<u>Arjun.Patney@winrock.org</u>> **Subject:** RE: Request for call on Methane Challenge

Hello Arjun,

Thank you very much for reaching out. I'm so sorry that I have not gotten back to you sooner (both on this and your earlier efforts to set up a meeting). Are you available next Friday, the 28th, for a meeting?

Ms. Carey Bylin

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U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Patney, Arjun [mailto:Arjun.Patney@winrock.org]

Sent: Wednesday, August 12, 2015 6:29 PM

To: Bylin, Carey

Subject: Request for call on Methane Challenge

Dear Carey,

I have been interested to learn of the proposed Natural Gas STAR Methane Challenge Program. I would like to discuss with you the potential intersection with the American Carbon Registry's methodology, "Conversion of High-Bleed Pneumatic Controllers in Oil & Natural Gas Systems," for carbon offsets. Please let me know when you may have time to speak. I'm available as follows:

8/13: 3 - 5pm EDT

8/14: anytime

8/17: 9am – 11am EDT

8/18: 9am – 11am EDT

8/20: 11am - 1pm EDT

Please let me know if there is a window in there that will work for you. If at all possible, I'd prefer to speak this week, as I'll be traveling next week. I look forward to hearing from you.

Kind regards,

Arjun

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800 J Street, Suite 539 | Sacramento, CA 95814 USA | www.winrock.org | www.americancarbonregistry.org

To: Patney, Arjun[Arjun.Patney@winrock.org]

From: Bylin, Carey

**Sent:** Fri 8/28/2015 5:09:36 PM

Subject: RE: Request for call on Methane Challenge

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800 J Street, Suite 539 | Sacramento, CA 95814 USA | <a href="www.americancarbonregistry.org">www.americancarbonregistry.org</a>

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Subject: RE: Request for call on Methane Challenge

Hi Carey,	
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From: Bylin, Carey

Importance: Normal

Subject: Meeting Forward Notification: DSI-EPA Call - Methane Challenge Program

**Start Date/Time:** Fri 8/28/2015 2:30:00 PM Fri 8/28/2015 3:00:00 PM

## Your meeting was forwarded

Bylin, Carey has forwarded your meeting request to additional people.

Meeting

DSI-EPA Call - Methane Challenge Program

**Meeting Time** 

Friday, August 28, 2015 10:00 AM - Friday, August 28, 2015 12:00 PM

Recipients

Suzanne Waltzer

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

From:

Bylin, Carey Ex. 6 - Personal Privacy Location:

Importance: Normal

**Subject:** Accepted: DSI-EPA Call - Methane Challenge Program **Start Date/Time:** Tue 9/1/2015 6:00:00 PM

Tue 9/1/2015 7:00:00 PM End Date/Time:

From: Bylin, Carey
Location: Ex. 6 - Personal Privacy
Importance: Normal

Subject: Accepted: DSI-EPA Call - Methane Challenge Program Start Date/Time: Fri 8/28/2015 2:00:00 PM

End Date/Time: Fri 8/28/2015 4:00:00 PM To: Patney, Arjun[Arjun.Patney@winrock.org]

From: Bylin, Carey

**Sent:** Fri 8/21/2015 3:05:40 PM

Subject: RE: Request for call on Methane Challenge

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#### Arjun Patney Policy Director

American Carbon Registry, an enterprise of Winrock International

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From: Bylin, Carey Fri 8/21/2015 2:03:17 PM Sent: Subject: RE: Aug 26 at 3 please Hi Theresa, I hope you are doing well. Thanks for your message about the Methane Challenge feedback deadline extension – I'm glad the new date works for you (and, importantly, for your vacation schedule). For our August 26 meeting, we can use the following conference line. Will it be a conference call or will some be attending in person? Toll-free dial-in number (U.S. and Canada): Ex. 6 - Personal Privacy International dial-in number: Ex. 6 - Personal Privacy Conference code: Ex. 6 - Personal Privacy Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program Global Methane Initiative U.S. Environmental Protection Agency Phone: +1-202-343-9669

Visiting Address & Private Deliveries (courier, FedEx etc.)

To:

Theresa Pugh[tpugh@ingaa.org]

1201 Constitution Ave NW, Room Number 4353 UU, Washington DC 20004

U.S. Mail Address:

Mail Code 6207M, 1200 Pennsylvania Ave NW, Washington DC 20460



From: Theresa Pugh [mailto:tpugh@ingaa.org] Sent: Wednesday, August 12, 2015 1:02 PM

To: Bylin, Carey

Subject: Aug 26 at 3 please

Thank you. We will want a dial in number. I am talking to Tom Bach now. He and his wife will be on vacation. He will call in.

I have to confirm with the others that they can come.

Thank you!

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, August 12, 2015 12:58 PM

To: Theresa Pugh

Subject: RE: Meeting Aug 26 at 3 please

Okay, will do. Let's plan to talk logistics and agenda once it's confirmed.

\_\_\_\_\_

Ms. Carey Bylin

International Programs Leader, Oil and Gas

Natural Gas STAR Program

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From: Theresa Pugh [mailto:tpugh@ingaa.org]
Sent: Wednesday, August 12, 2015 12:33 PM

To: Bylin, Carey

Subject: RE: Meeting Aug 26 at 3 please

Please hold 3-4:30 for us because the Canadians are two hours behind us. I don't want them feeling like they have to join a conf call at 7 am

Let me see if Tom's wife will hate me. I will call him now.

From: Bylin, Carey [mailto:Bylin.Carey@epa.gov] Sent: Wednesday, August 12, 2015 12:03 PM

To: Theresa Pugh

Subject: Meeting Aug 26?

Hi Theresa,

It looks like the following might work for us for a 90 minute EPA-INGAA meeting: 9a-10:30a or 3-4:30p. Let me know if either of those might work.

Ms. Carey Bylin

International Programs Leader, Oil and Gas

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To: Lacey, Pam[PLacey@aga.org] From: Bylin, Carey Sent: Thur 8/20/2015 12:42:33 PM Subject: RE: Questions: Methane Challenge comment deadline; also GTI CH4 Connections panel Hi Pam, Sorry for the delay in replying! I hope all is well. I assume you've seen that we have extended the Methane Challenge deadline. I hope the new deadline gives folks enough time to conduct their review and provide feedback. AS for the October 6 conference. Now that you mention it I believe someone from GTI reached out to me but I'm so hopelessly behind on e-mails I've never replied. We might be able to do October 6 – can you provide more information on the conference and the panel? On another note, we would like to organize a discussion with AGA and member companies to discuss the technical details of the Methane Challenge proposal. We are looking to set something up the week of August 31. Would that potentially work for you? We can make it a call, of course, to facilitate broad participation. Ms. Carey Bylin International Programs Leader, Oil and Gas Natural Gas STAR Program

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From: Lacey, Pam [mailto:PLacey@aga.org] Sent: Wednesday, August 12, 2015 4:18 PM

To: Bylin, Carey

Subject: Questions: Methane Challenge comment deadline; also GTI CH4 Connections panel

Hi Carey – Good presentation this afternoon for the ECOS webinar. Thanks! I have a couple of things to ask that are not related to ECOS –

- ➤• I hear there may be a slight extension of time to submit comments on the Methane Challenge proposal is that correct?
- ➤ GTI CH4 Connections I am moderating a panel on Oct. 6<sup>th</sup> at this conference on Initiatives to Reduce Methane Emissions. You were listed on the panel on the Preliminary Agenda, but now I see you have dropped off. Understandable given all that is going on. Could you suggest someone else to talk about the Methane Challenge? Or will you all be swamped at that point? Perhaps I could add someone to talk about the One Future pathway.

Thanks! - Pam

### Pamela A. Lacey | Senior Managing Counsel, Environment

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The American Gas Association represents more than 200 local energy companies committed to the safe delivery of clean natural gas to over 68 million customers throughout the nation.